

Candidate Recruitment Privacy Notice

Effective Date: 15th May 2026

Data Controller: Simplus Group [<https://www.simplus.com/>]

Data Protection Officer: Vasudev Kamath, vasudevrk@infosys.com

Write to: privacy@infosys.com.

1. Introduction

This Candidate Recruitment Privacy Notice ("Notice") explains how the Company collects, uses, stores, shares, and protects your personal data when you apply for employment or engage with our recruitment processes. We are committed to processing your personal data lawfully, fairly, and transparently, in accordance with the California Consumer Privacy Act ("CCPA") and all other applicable data protection laws.

Our recruitment processes are managed through Workday, a cloud-based Human Capital Management platform. When you apply, your personal data will be processed within the Workday Recruitment Module and may be accessible to authorized personnel on a need-to-know basis. By submitting your application, you acknowledge that you have read and understood this Notice.

2. Personal Data We Collect

We collect personal data at various stages of the application process. Certain data elements are mandatory and are required for us to process your application. Other data elements are voluntary, and your decision not to provide them will not affect your candidacy. The tables below describe the personal data we collect, organized by stage of the application process.

2.1 Candidate Profile

The following personal data is collected when you create your candidate profile and submit your application:

Data Element	Mandatory / Optional	Purpose
First Name	Mandatory	To identify you throughout the recruitment process and communicate with you regarding your application.
Last Name	Mandatory	To identify you throughout the recruitment process and communicate with you regarding your application.
Email Address	Mandatory	To communicate with you regarding your application status, interview scheduling, and related correspondence.
Phone Number	Mandatory	To contact you regarding your application, including for interview scheduling and time-sensitive communications.
Resume / CV	Mandatory	To evaluate your qualifications, skills,

		work experience, and suitability for the role.
Cover Letter	Optional	To gain additional insight into your motivation, qualifications, and interest in the role, as voluntarily provided by you.
LinkedIn Profile	Optional	To supplement your application with publicly available professional information relevant to the role.
Gender Pronoun(s)	Optional	To address you respectfully and in accordance with your preference throughout the recruitment process.
Street Address	Optional	To assess logistical considerations such as proximity to the work location and relocation needs.
City, State	Optional	To assess logistical considerations such as proximity to the work

		location and relocation needs.
Zip Code	Optional	To assess logistical considerations such as proximity to the work location and relocation needs.
How Did You Hear About This Opportunity?	Optional	To evaluate the effectiveness of our recruitment marketing channels and sources.
Referral Employee Name	Optional	To acknowledge and reward employees who participate in our employee referral program.
Current Employer (Company Name)	Optional	To understand your current employment context and assess your professional background.
Open to Freelance / Consulting?	Mandatory	To determine your availability and interest in alternative engagement models for the role.
Desired Compensation Range (Salary / Hourly)	Optional	To assess alignment between your compensation

		expectations and the budgeted range for the role.
Visa Sponsorship Required?	Optional	To assess whether the Company will need to sponsor your employment visa status (e.g., H-1B) now or in the future, and to support workforce and immigration planning.
Type of Sponsorship Assistance Needed	Optional	To understand the specific nature of any immigration sponsorship you may require, enabling early planning for compliance with applicable immigration laws.
Legal Name (As It Appears on Government ID)	Optional	To support identity verification at later stages of the recruitment process, such as background checks and contract execution.
Are you legally authorized to work in	Mandatory	To verify your legal right to work in the applicable jurisdiction, as required

the location where you are applying for the job?		by applicable immigration and employment law.
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2.2 Application — Introduction and Background

The following data is collected or processed during the introductory stage of your application:

Data Element	Mandatory / Optional	Purpose
How Did You Hear About Us? (Source Selection)	Optional	To allow you to self-identify the recruitment source through which you learned of this opportunity, enabling us to measure the effectiveness of our recruitment channels.
Recruiting Sources (Auto-Tagging)	Automated	Certain recruitment sources may be automatically tagged to your application based on the channel through which you arrived (e.g., job board, career site, social media referral). This automated tagging helps us track and analyze recruitment source effectiveness without requiring you to

		manually select a source.
Resume Parsing	Automated	When you upload your resume or CV, our system may automatically extract structured data (such as your name, contact details, work history, education, and skills) to populate your candidate profile. This automated processing is designed to streamline the application process and reduce the need for manual data entry.

2.3 Application — Personal Information (Equal Employment Opportunity Data)

In accordance with applicable equal employment opportunity ("EEO") laws and regulations, the following personal data is collected on a voluntary self-identification basis. This information is used solely for EEO compliance, reporting, and monitoring purposes and is **not** used in the evaluation of your candidacy or in any hiring decision. Responses are maintained separately from your application and are not accessible to hiring managers or recruiters involved in the selection process.

Data Element	Mandatory / Optional	Purpose
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Gender	Mandatory	To comply with federal and state equal employment opportunity reporting obligations and to monitor and promote diversity in our workforce.
Race / Ethnicity (Single Select)	Mandatory	To comply with federal EEO-1 reporting requirements and to monitor and promote diversity in our workforce.
Race / Ethnicity (Multi-Select)	Mandatory	To allow you to identify with more than one racial or ethnic category, in accordance with OMB and EEOC reporting standards.
Hispanic or Latino?	Mandatory	To comply with federal EEO-1 reporting requirements, which require separate identification of Hispanic or Latino ethnicity.
Veterans Status	Mandatory (only when applicable)	To comply with the Vietnam Era Veterans' Readjustment

		Assistance Act ("VEVRAA") and related federal contractor obligations, and to support our commitment to veteran employment.
Voluntary Self-Identification of Disability	Mandatory	To comply with Section 503 of the Rehabilitation Act and related federal contractor obligations, and to support our commitment to providing equal employment opportunities to individuals with disabilities.

2.4 Application — Previous Worker Verification

Data Element	Mandatory / Optional	Purpose
Previous Worker Verification (Have you previously worked for this organization?)	Optional	To identify candidates who have previously been employed by the Company, which may affect eligibility for rehire, benefits continuity, or applicable company policies.

3. Lawful Bases for Processing

We process your personal data on the basis of one or more of the following lawful bases, as determined by the jurisdiction in which you are located and the applicable data protection law.

3.1 United States

In the United States, there is no single comprehensive federal data privacy law governing the processing of candidate personal data in the recruitment context. The processing of your personal data is conducted on the following basis:

Legitimate Business Purpose. The collection and processing of your application data serve the Company's legitimate business purpose of evaluating candidates for employment. This includes processing your name, contact details, resume/CV, work history, qualifications, and other application materials necessary to assess your suitability for the role.

California Consumer Privacy Act / California Privacy Rights Act ("CCPA/CPRA"). If you are a California resident, your personal information is collected and processed for the business purposes specified in this Notice, including evaluating your candidacy, communicating with you regarding your application, and complying with legal obligations. We do not "sell" or "share" (as those terms are defined under the CCPA) your personal information. You have the right to know what personal information we collect and how it is used, the right to request deletion, the right to correct inaccurate information, and the right to non-discrimination for exercising your privacy rights.

Federal Equal Employment Opportunity Laws. The collection of EEO data (gender, race/ethnicity, veteran status, and disability status) is required to comply with federal equal employment opportunity and affirmative action obligations, including Title VII of the Civil Rights Act of 1964, the EEO-1 reporting requirements of the Equal Employment Opportunity Commission ("EEOC"), the Vietnam Era Veterans' Readjustment Assistance Act ("VEVRAA"), and Section 503 of the Rehabilitation Act of 1973.

Immigration and Nationality Act ("INA"). The collection of information regarding your authorization to work in the United States and any potential need for visa sponsorship is conducted in accordance with the INA and its implementing regulations. This information is not used to discriminate on the basis of national origin, citizenship status, or immigration status; it is used solely to assess the Company's ability to comply with its obligations under applicable immigration law.

State Privacy Laws. Various US states have enacted consumer privacy laws that may apply to the processing of your personal data, including the Colorado Privacy Act, the Connecticut Data Privacy Act, the Virginia Consumer Data Protection Act, the Texas Data Privacy and Security Act, and similar legislation. Where applicable, we comply with the requirements of these laws, including providing adequate notice, honoring opt-out requests, and processing data subject rights requests within the timeframes prescribed by law.

3.2 Special Category and Sensitive Data (Cross-Jurisdictional)

Certain data collected during the application process may constitute special category data or otherwise require heightened protection under applicable law. We process such data only where a specific legal exemption or authorization applies in the relevant jurisdiction.

Gender, Race/Ethnicity, Hispanic or Latino Origin, Veteran Status, and Disability Status.

- **United States:** Collected and processed to comply with federal EEO and affirmative action requirements under Title VII of the Civil Rights Act, VEVRAA, Section 503 of the Rehabilitation Act, and applicable EEOC and OFCCP regulations. This data is collected on a voluntary self-identification basis.

This data is collected separately from the substantive evaluation of your application, is not accessible to hiring decision-makers, and is used only in aggregate for compliance reporting and workforce diversity monitoring.

Gender Pronouns. We recognize that gender pronouns may, in certain circumstances, reveal information about an individual's sex life or sexual orientation, which constitutes special category data under applicable laws. Accordingly, we collect gender pronouns on an entirely voluntary basis:

- **United States:** Collected on a purely voluntary basis to facilitate respectful communication.

You are under no obligation to provide your gender pronouns, and your decision not to do so will have no effect on your application. If you do choose to share your pronouns, we will use them solely for the purpose of addressing you respectfully throughout the recruitment process. You may withdraw your consent and request deletion of this data at any time by contacting us at privacy@infosys.com.

3.2 Philippines

We process personal information where permitted under the Philippines Data Privacy Act of 2012, including where you have consented, where processing is necessary to take steps before entering into an employment contract, where processing is necessary to comply with a legal obligation, or where processing is necessary for the Company's legitimate interests and those interests are not overridden by your fundamental rights and freedoms. Sensitive personal information is processed only where a lawful basis under the Philippines DPA applies, such as your consent, an applicable legal requirement, protection of lawful rights and interests, or another basis permitted by law. We apply the principles of transparency, legitimate purpose, and proportionality throughout the recruitment process.

3.3 Australia

We collect and handle personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles. We collect personal information only where it is reasonably necessary for, or directly related to, our recruitment functions and activities, and we generally collect it directly from you where reasonable and practicable. Sensitive information is collected only with your consent unless another exception applies, and only where reasonably necessary

for our recruitment functions or activities. The employee records exemption does not apply to job applicants before employment commences, so the APPs apply to candidate personal information during recruitment.

4. Automated Processing and Profiling

4.1 Resume Parsing

When you upload your resume or CV, our recruitment system may use automated tools to extract and organize information such as your name, contact details, work history, education, qualifications, and skills. This processing is used to populate your candidate profile, reduce manual data entry, improve the efficiency of the application process, and support recruiter review. Resume parsing is not used to make final hiring decisions without human review. Recruiters, hiring managers, and other authorized personnel review relevant application materials before making substantive recruitment decisions, including screening, shortlisting, interview selection, and hiring recommendations.

4.2 Recruiting Source Auto-Tagging

Our recruitment system may automatically identify and record the source through which you arrived at our career site, such as a job board, social media platform, employee referral link, recruiting campaign, or career page URL. This tagging is used for recruitment administration, source tracking, reporting, and analytics, including measuring the effectiveness of recruitment channels. Recruiting source information is not used as the sole basis for rejecting, ranking, or selecting candidates, and you will not be subject to an adverse hiring decision solely because of the recruitment source associated with your application.

4.3 Your Rights Regarding Automated Processing

We do not make final employment decisions based solely on automated tools. Where automated tools are used to support recruitment administration, such as resume parsing, recruiting source tagging, scheduling, workflow routing, or analytics, they are used to assist the recruitment process and not to replace human review. Where required by applicable U.S. federal, state, or local law, we will provide any required notices, disclosures, assessments, appeal rights, opt-out rights, or other legally required information relating to automated employment decision tools, artificial intelligence tools, or profiling used in hiring. If you have questions about the use of automated tools in connection with your application, please contact us at privacy@infosys.com.

5. How We Use Your Personal Data

We use your personal data for the following purposes:

- To evaluate your qualifications, experience, skills, and suitability for the position for which you have applied and, where you consent, for other positions that may become available.
- To communicate with you regarding your application status, interview scheduling, and other recruitment-related matters.
- To verify the information you have provided, including through background checks and reference checks (at the appropriate stage of the process and with your knowledge).
- To comply with applicable legal and regulatory obligations, including equal employment opportunity reporting and immigration law requirements.
- To administer and track the effectiveness of our recruitment channels, sources, and employee referral program.
- To improve our recruitment processes and candidate experience through analytics and reporting on aggregated, non-identifying data.
- To address you respectfully and in accordance with your stated preferences (e.g., gender pronouns), where voluntarily provided.

- To assess logistical and administrative considerations such as work location, relocation, compensation alignment, and engagement model (e.g., full-time versus freelance/consulting).

6. How We Share Your Personal Data

We may share your personal data with the following categories of recipients, each of whom is bound by appropriate confidentiality and data protection obligations:

Internal Recipients. Your application data will be accessible to authorized personnel within the Company who are directly involved in the recruitment process, including recruiters, hiring managers, and members of the relevant interview panel. EEO data is accessible only to authorized HR and compliance personnel and is not shared with hiring decision-makers.

Service Providers and Data Processors. Your personal information is processed within the Workday Recruitment Module, a cloud-based platform operated by Workday, Inc. as a service provider on behalf of the Company. A data processing agreement or equivalent contractual arrangement has been executed with Workday governing its obligations with respect to your personal information. Your information may also be shared with other service providers engaged by the Company to support the recruitment process, such as background check providers, assessment or psychometric testing providers, recruitment agencies, interview scheduling tools, and communications providers, each subject to appropriate contractual obligations.

Legal and Regulatory Authorities. We may disclose your personal data to governmental or regulatory authorities, required to comply with applicable laws, regulations, or legal proceedings, including EEO reporting obligations.

Group Entities. Where the Company is part of a group of affiliated entities, your personal data may be shared with affiliates for the purposes of centralized recruitment administration, subject to appropriate data sharing agreements.

We do not sell your personal data to third parties. We do not share your personal data with third parties for their own direct marketing purposes.

7. International Data Transfers

Your personal information may be transferred to, stored in, or accessed from locations within or outside the United States in connection with the Company's recruitment operations, service provider arrangements, information technology systems, and group-wide recruitment administration. Where we transfer or disclose personal information to service providers, affiliates, or other recipients, we use appropriate contractual, technical, and organizational safeguards designed to protect your personal information and limit its use to the purposes described in this Notice.

For candidates in the Philippines, cross-border transfers are conducted in accordance with the Philippines DPA, including the principles of transparency, legitimate purpose, and proportionality, and with appropriate contractual or organizational safeguards where personal data is processed by personal information processors or disclosed to affiliates, service providers, or other recipients.

For candidates in Australia, where personal information is disclosed to an overseas recipient, we take reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to the information, unless an exception applies, such as where the recipient is subject to a substantially similar law or binding scheme, you have provided informed consent after being told that APP 8.1 will not apply, or the disclosure is otherwise required or authorized by law.

8. Data Retention

We retain your personal data for the following periods:

Successful Candidates. If you are offered and accept employment with the Company, your recruitment data will be transferred to your employee personnel file and retained in accordance with our Employee Privacy Notice and applicable retention policies.

Unsuccessful Candidates. If your application is unsuccessful, we will retain your personal data for a period, depending on following the conclusion of the

recruitment process, in order to defend against potential legal claims, to comply with applicable legal obligations, and to contact you about future opportunities (where you have consented to this). After the expiration of this retention period, your personal data will be securely deleted or anonymized.

Talent Pool. Where you have provided your consent, we may retain your personal data in our talent pool for the purpose of contacting you about future job opportunities. You may withdraw your consent and request removal from the talent pool at any time.

EEO Data. EEO data is retained in accordance with applicable federal and state recordkeeping requirements, which may require retention for periods specified by law (e.g., one year under EEOC regulations, or two years for federal contractors under OFCCP requirements).

9. Your Rights

Depending on the U.S. state in which you reside, you may have certain rights with respect to your personal information. These rights may include the right to know or access the personal information we collect about you, the right to request correction of inaccurate personal information, the right to request deletion of personal information, the right to receive information about the categories of personal information collected, used, disclosed, sold, or shared, and the right not to be discriminated against for exercising applicable privacy rights.

California Residents. If you are a California resident, you have additional rights under the CCPA, including the right to know, the right to delete, the right to correct, and the right to non-discrimination for exercising your privacy rights. We do not sell or share (as defined by the CCPA) your personal information.

Other U.S. State Residents. If you reside in a state with applicable privacy law, you may have additional rights under that law. We will honor applicable rights requests in accordance with the requirements and limitations of the relevant law.

Philippines Candidates. If you are located in the Philippines or your personal data is processed under the Philippines DPA, you may have the right to be informed,

the right to object, the right of access, the right to rectification, the right to erasure or blocking, the right to damages, the right to data portability, and the right to file a complaint with the National Privacy Commission. Where processing is based on consent, you may withdraw your consent, subject to legal and contractual limitations and any processing that remains necessary or authorized under another lawful basis.

Australia Candidates. If you are in Australia, you may have the right to request access to the personal information we hold about you under APP 12 and to request correction of personal information that is inaccurate, out-of-date, incomplete, irrelevant, or misleading under APP 13. You may also make a privacy complaint to us, and if you are not satisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner.

To exercise any of your rights, please contact us at privacy@infosys.com or write to address mentioned in Annexure A. We will respond to your request within the timeframe required by applicable law.

10. Security

We have implemented appropriate technical and organizational measures to protect your personal data against unauthorized access, alteration, disclosure, or destruction. These measures include encryption of data in transit and at rest, role-based access controls, multi-factor authentication, and regular security assessments. Your personal data is processed within the Workday Recruitment Module, which maintains SOC 2 Type II certification, ISO 27001 certification, and other industry-recognized security standards.

11. Changes to This Notice

We may update this Notice from time to time to reflect changes in our recruitment practices, applicable laws, or the technology we use. Where material changes are made, we will notify you by posting the updated Notice on our career site and updating the effective date. We encourage you to review this Notice periodically.

12. Contact Us

If you have any questions, concerns, or requests regarding this Notice or the If you have any questions, concerns, or requests regarding this Notice or our processing of your personal information, please contact us at: privacy@infosys.com

Data Protection Officer: Vasudev Kamath, vasudevrk@infosys.com

You also have the right to lodge a complaint with your local data protection supervisory authority.

United States: You may contact the California Attorney General's office (for CCPA/CPRA matters) or the relevant state attorney general in your state of employment.

Philippines: You may contact the National Privacy Commission 25th-27th Floors, The Upper Class Tower, Quezon Avenue corner Scout Reyes Street, Quezon City, Philippines Website: <https://privacy.gov.ph/>

Complaints information: <https://privacy.gov.ph/file-a-complaint/>

Australia: Office of the Australian Information Commissioner, Website: <https://www.oaic.gov.au/>

Privacy complaints: <https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us>

Annexure A – List of Entities in Simplus Group

<p>Simplus Philippines, Inc.</p>	<p>Philippines</p>	<p>25th Floor, Picadilly Star Building, 27th St. corner 4th Ave., BGC Taguig City, 1634 Metro Manila; 5F, Phinma Plaza, 39 Plaza Drive, Rockwell Center, Makati City.</p>
<p>Simplus ANZ Pty Ltd.</p>	<p>Australia</p>	<p>Level 3, 100 Arthur Street, North Sydney 2060, Australia.</p>
<p>Simplus Australia Pty Ltd</p>	<p>Australia</p>	<p>Level 3, 100 Arthur Street, North Sydney 2060, Australia.</p>
<p>Outbox Systems Inc. d/b/a Simplus</p>	<p>United States</p>	<p>10 West Broadway, Suite 500, Salt Lake City, UT 84101.</p>