

Public version

# Capgemini Binding Corporate Rules

For Processor Activities





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## Introduction

As a global leader in consulting, technology services and digital transformation, Capgemini is at the forefront of innovation to address the entire breadth of clients' opportunities in the evolving of cloud, digital and platforms. Building on its strong 50-year heritage and deep industry-specific expertise, Capgemini enables organisations to realize their business ambitions through an array of services from strategy to operations. Capgemini therefore processes large amounts of personal data.

Capgemini is committed to protecting all personal data entrusted to it as part of its activities as a Data Controller and as a Data Processor. As an international group with entities located in more than 40 countries, it is important to Capgemini that information flows freely and securely. Providing an appropriate level of protection to the personal data being transferred within the group, is one of the reasons why Capgemini has chosen to implement these Binding Corporate Rules (**BCR**) which were first approved by the French data protection authority, the CNIL, in March 2016. This is all the more important as legal data protection and legal data security are crucial for each affiliate of Capgemini. The financial and reputational risks are high.

For this very reason, Capgemini's BCR should not be construed as a mere transfer mechanism, but rather as a comprehensive personal data protection framework defining our entire accountability approach to the processing of personal data.

Capgemini's BCR define indeed not only the principles with which it shall comply with when processing personal data but also specify the procedures designed to address Capgemini compliance with applicable data protection laws and in particular with the General Data Protection Regulation 2016/679 (**GDPR**).

## Definitions

The terms used in this document are defined as follows:

**“Applicable DP Law”** means any applicable data protection regulation that may apply and in particular (i) the European Regulation n° 2016/679 relating to the processing of Personal Data (**GDPR**), and (ii) any applicable laws and regulations relating to the processing of Personal Data.

**“Binding Corporate Rules”** or **“BCR”** means a Data Protection policy which is adhered to by a controller or processor for transfers or a set of transfers of personal data to a controller or processor in one or more third countries within a group of undertakings, or group of enterprises engaged in a joint economic activity. They comprise this document together with its appendices and the BCR-C.

**“Binding Corporate Rules for Controller Activities”** or **“BCR-C”** means the BCR applicable to Capgemini’s activities as a Data Controller, and in particular, where a Capgemini Company acting as Controller Transfers Personal Data to another Capgemini Company acting as Controller or Processor.

**“Binding Corporate Rules for Processor Activities”** or **“BCR-P”** means the BCR applicable to Capgemini’s activities as a Data Processor.

**“Capgemini Business Contact”** means a Capgemini supplier, subcontractor, shareholder, client or partner.

**“Capgemini”** or **“Group”** means all the entities owned and/or controlled directly or indirectly by Capgemini SE.

**“Capgemini Company(ies)”** means any entity which is part of the Group and which is bound by the BCR.

**“Capgemini Client”** means any natural or legal person to which Capgemini provides services to, pursuant to an agreement.

**“Capgemini Employee”** means any and all current, former or prospective staff member of

Capgemini, including agency workers and interns.

**“Controller”** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

**“Cybersecurity Organisation”** means the global function creating and managing global security policies; and tracking compliance from Business Units and Global Business Lines. The Cybersecurity Organisation is made up of a network of Cybersecurity Officers appointed for each Business Unit.

**“Data Protection Impact Assessment”** or **“DPIA”** means a process designed to describe the processing, assess its necessity and proportionality and help manage the risks to the rights and freedoms of natural persons resulting from the processing of Personal Data by assessing them and determining the measures to address them.

**“Data Protection Officer”** or **“DPO”** means the designated Capgemini Employees possessing expert knowledge of data protection law and practices, dedicated to advise, inform, and monitor compliance with the Applicable Law, and who are part of the Data Protection Organisation described in Section 8.

**“Data Subject”** means any identified or identifiable natural person whose Personal Data is processed.

**“EEA Capgemini Company”** means any Capgemini Company located in the European Economic Area (or **“EEA”**).

**“Non-EEA Capgemini Company”** means any Capgemini Company located outside of the EEA.

**“Employee Personal Data”** means Personal Data relating to a current, former or prospective Capgemini Employee.

**“EU Model Clauses”** or **“Model Clauses”** » means the contractual clauses issued by the

European Commission to frame data transfers from Controllers established in the EEA to Controllers established outside of the EEA (decision and from Controllers established in the EEA to Processors established outside of the EEA.

**“Personal Data”** means any information relating to an identified or identifiable natural person (i.e. **“Data Subject”**). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**“Processing”** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**“Processor”** means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller.

**“Personal Data Breach”** or **“Data Breach”** means the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise processed, whether resulting from a security breach or not.

**“Service Agreement”** means a written agreement between a Controller and Processor whereby the Processor shall provide services to the Controller and which entails the processing of Personal Data by the Processor under the instructions of the Controller.

**“General Data Protection Regulation”** or **“GDPR”** means Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

**“Intra-Group Agreement”** means the legally binding agreement designed to make the BCRs binding upon the Capgemini Companies.

**“Special Categories of Personal Data”** means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation.

**“Supervisory Authority(ies)”** or **“Data Protection Authority(ies)”** means the public authorities responsible for monitoring the application of the GDPR and/or any Applicable Laws.

**“Transfer”** means the disclosure, transmission or the process of making Personal Data available to any third-party.

# 1. Scope of the BCR

The BCR apply to and frame all Personal Data transfers within Capgemini and drive the Group's accountability approach. As a result, the BCR constitute the data protection policy defining the applicable data protection principles with which Capgemini shall comply.

Where Applicable DP Law requires a higher level of protection than the commitments defined under the BCR, it will take precedence over the BCR.

## 1.1 Material Scope

These BCR apply to all Personal Data processed within Capgemini, where Capgemini is acting as Processor.

Where acting as Processor, Capgemini processes Personal Data on behalf of Controllers and according to their instructions.

Capgemini provides an array of services including consulting services which enhance the performance of organisations based on in-depth knowledge of client industries and processes; application services which devise, develop, implement and maintain IT applications covering integration; application maintenance activities, hosting; and technology and engineering services which provide assistance and support to internal IT teams within client companies; and other managed services which integrate , manage and/or develop either fully or partially, clients' IT infrastructure systems, transaction services and on demand services and/or business activities.

For a more comprehensive view of Capgemini's processing activities as a Processor, refer to Appendix 2.

## 1.2 Geographical Scope

These BCR cover all Personal Data being transferred and further processed within the Group, regardless of the origin of the Personal Data. In practice, this means that the BCR will apply to Personal Data transferred from:

1. An EEA Capgemini Company to another EEA Capgemini Company;
2. An EEA Capgemini Company to a Non-EEA Capgemini Company;
3. A Non-EEA Capgemini Company to an EEA Capgemini Company; and
4. A Non-EEA Capgemini Company to another Non-EEA Capgemini Company.

The Capgemini Companies, bound by the BCR, are listed on the Capgemini [website](#).

## 2. Bindingness of the BCR

Each Capgemini Company, and its Employees, is legally bound by and required to comply with the BCR.

### 2.1 Bindingness upon Capgemini Companies

In practice, each entity of Capgemini gives a power of attorney to Capgemini International BV to sign the Intra-group Agreement on its behalf so that each Capgemini entity is effectively bound to comply with the BCR vis-à-vis each other. By signing the Agreement, the Capgemini entity commits to comply with the provisions of the BCR, and to implement them within its own organisation.

As for newly acquired Capgemini entities, located outside the EEA, no Personal Data shall be transferred to them, until they are effectively bound by the BCR according to the above-mentioned mechanism.

### 2.2 Bindingness upon Capgemini Employees

All Capgemini Employees are bound by the BCR through a specific mention in their employment contracts and/or through the obligation, contained in all employment contracts, to comply with the Group's policies, which include the BCR.

As further detailed in Sections 9 and 16 of the BCR, Capgemini Employees are made aware of the BCR, and the ensuing obligations, through internal communication and training. Capgemini Employees are also made aware of the fact that the non-compliance with the BCR may lead to sanctions according to applicable local laws.



## 2.3 Bindingness vis-à-vis Controllers

Where acting as a Processor, Capgemini undertakes to enter into Service Agreements compliant with the requirements set out in article 28 of the GDPR.

In addition, Capgemini commits to complying with the BCR, which shall be made binding on the Capgemini Companies, through a specific reference in the Service Agreement.

In any case, the Controller shall be able to enforce the BCR against any Capgemini Company for breaches of the BCR, it caused, according to the provisions set out in Section 12.

## 3. Data protection principles implementation within Capgemini

Capgemini is committed to complying with the data protection principles set out in these BCR, irrespective of Applicable DP Law, unless Applicable DP Law is providing more stringent requirements than those set up in the BCR. All these principles are promoted and implemented within Capgemini through a set of privacy by design policies and trainings.

Furthermore, where acting as Processor, Capgemini shall notify the Controller if its instructions clearly infringe Applicable DP Law.

### 3.1 Clear identified purpose

Where acting as Processor, Capgemini must strictly comply with the instructions of the Controller, in particular in relation to the reasons for which the Personal Data shall be processed.

**In practice**, this means that Capgemini must comply with the provisions set out in the Service Agreement and must not process the Personal Data for any other purpose, unless expressly authorised by the Controller, and subject to Applicable DP Law.

### 3.2 Legal basis

Where acting as Processor, Capgemini shall assist the Controller in the implementation of the organisational and technical measures to enable the Controller to comply with the obligation to have a legal basis for processing activities.

**In practice**, Capgemini may need to assist the Controller by implementing mechanisms to obtain Data Subjects' consent on behalf of the Controller. In any case, such support will be subject to negotiations to be captured in the Service Agreement entered into between Capgemini and the Controller. Capgemini shall not take over the responsibility to determine what is the valid legal basis on behalf of the Controller and what are the appropriate technical and organisational measures to be implemented for the implementation of the consent mechanism.

## 3.3 Data minimization

Where acting as Processor, Capgemini must strictly comply with the instructions of the Controller.

In addition, when designing and developing a product or service involving the processing of Personal Data, such service or product should be developed so that it only collects and processes the Personal Data which is necessary for the purpose(s) of the processing, as determined by the Controller.

**In practice**, this means that Capgemini shall cooperate with and support the Controller in limiting the personal data which needs to be collected when designing applications or systems is part of its scope of services. However, this shall not be interpreted as an obligation for Capgemini to determine itself which Personal Data should be collected when acting on behalf of the Controller.

## 3.4 Data quality

Where acting as Processor, Capgemini must assist the Controller in complying with its obligation to keep the data accurate and up to date.

This means that Capgemini must update, correct, or delete the Personal Data upon request of the Controller insofar as this is technically possible, and in the conditions, agreed between the parties under the Service Agreement. Where the Data has been disclosed to a Capgemini Company acting as sub-Processor, it will be notified of such modifications.

**In practice**, Capgemini is to implement the technical measures necessary to comply with the Controller's instructions regarding any request to update, correct or delete the Personal Data.

## 3.5 Data retention limitation

Where acting as Processor, Capgemini must ensure that, pursuant to the provisions of the Service Agreement and according to the Controller's instructions, Personal Data are either deleted or returned to the Controller upon termination and/or upon request of the Controller.

**In practice**, this means that Capgemini must implement the necessary technical and organisational measures to make sure that the Personal Data is either deleted or returned to the Controller, as agreed between the parties in the Service Agreement and/or according to the Controller's instructions.

## 3.6 Security

Where acting as Processor, Capgemini must implement the appropriate technical and organisational measures, as agreed with the Controller, to ensure a high level of security to the Processing of Personal Data entrusted to it by the Controller.

**In practice**, this means that Capgemini must implement the agreed upon provisions included in the Service Agreement. In addition, in case of a Data Breach, Capgemini is to notify the Controller without undue delay and shall assist it in addressing the Data Breach, as agreed between the parties in the Service Agreement.

## 3.7 Processing of Special Categories of Personal Data

Where acting as Processor, Capgemini shall process Special Categories of Personal Data on behalf of the Controller and as per its request.

When processing Special Categories of Personal Data, Capgemini shall implement any reinforced technical and organisational measures as per the Controller's instructions, and subject to commercial negotiations, to ensure the security of the Processing.

## 3.8 Automated individual decision

Data Subjects have the right not to be subject to a decision based solely on automated Processing, including profiling, which produces legal effects concerning them or significantly affects them. However, this right does not apply if the decision is:

1. Necessary for entering into, or performance of, a contract between the Data Subject and the Controller;
2. Authorised by Union or Member State law to which the Controller is subject and which also lays down suitable measures to safeguard the Data Subject's rights and freedoms and legitimate interests;
3. Based on the Data Subject's explicit consent.

Capgemini must follow the instructions of the Controller and strive to enable the Controller to comply with its obligation to inform the Data Subjects.

## 4. Internal and External Sub-Processing

### 4.1 Basic obligation – Data Processing Agreement or Clause (“DP Clause”) in the Service Agreement

Where acting as Processor, Capgemini shall rely on Sub-Processors either within or outside of the Group only to the extent that such Sub-Processors provide sufficient guarantees to implement technical and organisational measures to ensure that the Processing is carried out in compliance with Applicable DP Law and the principles set out in the BCR.

**In practice**, this means that, when relying on a third party or on another Capgemini Company acting as Processor, Capgemini shall enter into a Service Agreement which sets up the conditions under which the processing activities must take place. The Service Agreement shall contain a DP Clause reflecting as a minimum that the Sub-Processor must:

- process the Personal Data only on the documented instructions of Capgemini as Processor acting on behalf of the Controller – including with regard to Transfers outside of the EEA, to a non-adequate country;
- inform the Controller if its instructions infringe Applicable DP Law and in particular the GDPR;
- ensure that persons authorised to process the Personal Data have committed themselves to confidentiality;
- implement technical and organisational measures to ensure an appropriate level of protection to the Personal Data;
- only use a sub-Processor with the prior specific or general authorisation of Capgemini as Processor acting on behalf of the Controller and enter into a Service Agreement with the sub-Processor providing the same obligations as the ones described here;
- assist Capgemini – acting on behalf of the Controller – for the fulfilment of its obligation to respond to requests from Data Subjects;
- assist Capgemini – acting on behalf of the Controller – in ensuring compliance with its obligations in terms of security of the Processing, carrying out DPIAs, reporting Data Breaches;
- at the choice of Capgemini – acting on behalf of the Controller – and as agreed in the Service Agreement, to either delete or return the Personal Data after the end of the provision of services relating to the Processing;
- make available to Capgemini – acting on behalf of the Controller – all the information necessary to demonstrate compliance with its obligations under the GDPR, and in particular allowing Capgemini to conduct audits;
- report any Data Breach to Capgemini without undue delay.

In any case, where relying on a third party, Capgemini shall carry out an assessment of the data protection and security guarantees which such third party commits to implement and to comply with.

## 4.2 Additional obligation in case of a data transfer to a third country

In addition to the implementation of the above-mentioned Data Processing Agreement or Clause, where Processing or Sub-processing gives rise to Transfers to third countries, Capgemini must guarantee that an adequate level of protection is provided, as per the requirements defined below.

**In practice,** where an EEA Capgemini Company acting as Processor on behalf of a Controller established in the EEA intends to transfer Personal Data to a Non-EEA Capgemini Company, the BCR provide an adequate level of protection to the Personal Data transferred.

Where an EEA Capgemini Company acting as Processor on behalf of a Controller established in the EEA intends to transfer Personal Data to a third party located out of the EEA, the parties must enter into the relevant EU Model Clauses.

In any case, where acting as Processor, Capgemini shall make sure that before any such Transfer to a third country takes place, it obtains the Controller prior authorisation.

In addition to the obligations detailed herein, where transferring Personal Data from the EEA to a third country which does not benefit from an adequacy decision granted by the European Commission, Capgemini shall further comply with the provisions of Sections 15 & 16 of these BCR.

## 5. Transparency

Where acting as Processor, Capgemini must assist the Controller in complying with the obligation to inform the Data Subjects.

**In practice,** this means that Capgemini must provide the Controller with detailed information regarding the Processing, and in particular with the data recipients including the entities to which the personal data may be transferred, in order to enable the Controller to correctly inform the Data Subjects.

## 6. Data Subjects' enforcement rights

Data Subjects can enforce provisions of the BCR on Capgemini, as third-party beneficiaries, as detailed below.

Data Subjects can enforce the following elements of the BCR directly on Capgemini acting as Processor:

- The duty for Capgemini to respect the instruction of the Controller regarding data Processing, as detailed in Section 2;
- The duty for Capgemini to implement appropriate technical and organisational security measures, as detailed in Sub-Section 3.6;
- The duty to notify the Controller in case of a Personal Data Breach, as detailed in Sub-Section 3.6;
- The duty for Capgemini to only engage sub-processors in compliance with the provisions of article 28 of the GDPR, as detailed in Section 4;
- The duty for Capgemini to cooperate with and assist the Controller in complying with and demonstrating compliance to the GDPR, as detailed in Sections 3 and 15;
- The fact that Capgemini grants easy access to the BCR, as detailed in Section 16;
- The right for Data Subjects to complain through the internal complain mechanism of Capgemini, as detailed in Section 7;
- The duty for Capgemini to cooperate with Supervisory Authorities competent for the Controller, as detailed in Section 15;
- The right for Data Subjects to lodge a complaint before the competent Supervisory Authority and/or before the competent courts of law, as detailed in Sections 7 and 13;
- The duty for Capgemini Companies, and their employees, to respect the BCR as detailed in Section 2;
- The obligation for each Capgemini Company exporting Personal Data outside of the EEA, to accept liability for any breaches of the BCR by the sub-processors (internal or external to Capgemini) established outside of the EEA, which received the Personal Data, as detailed in Section 12;
- The fact that it is up to the EEA Capgemini Company, which exported the Personal Data, to demonstrate that the sub-processor located outside of the EEA (i.e. the recipient of the data) did not breach the BCR, as detailed in Section 12;
- Data Subjects can enforce additional elements of the BCR on Capgemini acting as a Processor, if they cannot bring a claim to the Controller because the Controller has factually disappeared or ceased to exist in law or has become insolvent – and no successor entity has assumed the legal obligations of the Controller by contract or by operation of law;
- The duty for Capgemini to create third-party beneficiary rights for Data Subjects, as detailed in this very Section;
- The data protection principles listed in Sections 3, 4 and 5;
- The obligation to list the Capgemini Companies, as detailed in Section 1 and set out on the Capgemini website;

Where Data Subjects are not able to bring claim against the Controller directly, because the Controller has factually disappeared or ceased to exist in law or has become insolvent, they may enforce the following rights against Capgemini acting as Processor:

- The duty for all Capgemini Companies listed under Appendix 1 to comply with the BCR-P, as further detailed under Section 2;
- The creation of third-party beneficiary rights for data subjects, as detailed under this Section;

- The obligation for each EEA Capgemini Company transferring Personal Data to a Non-EEA Capgemini Company on the basis of the BCR, to accept liability for any breaches of the BCR by the Non-EEA Capgemini Company which received the Personal Data, as detailed under Section 12;
- The fact that in case of a breach of the BCR by a Non-EEA Capgemini Company, it is up to the EEA Capgemini Company which exported the Personal Data to demonstrate that the recipient (i.e. the Non-EEA Capgemini Company) did not breach the BCR, as detailed under Section 12;
- The fact that Capgemini grants easy access to the BCR, as detailed under Section 16;
- The right for Data Subjects to complain through the internal complaint mechanism of Capgemini, as detailed under Section 7;
- The duty for Capgemini to cooperate with the Supervisory Authorities, as detailed under Section 15;
- The duty for Capgemini to cooperate with and support the Controller as detailed under Section 17;
- The data protection principles detailed in Sections 3, 4 and 5;
- The obligation, for each Capgemini Company, to notify the competent Supervisory Authority as well as the Capgemini headquarters, in case of a conflict between the local legislation and the BCR, as detailed in Section 14;
- The obligation for Capgemini to keep and maintain a record of Processing activities carried out on behalf of Controllers, as detailed under Sub-Section 10.1;
- The obligation for Capgemini to support Controllers in complying with their obligation to implement privacy by design and by default, as detailed under Sub-Section 10.2;
- The obligation for Capgemini Companies to allow for audit carried out by Controllers, as detailed under Section 11;
- The obligation to list the Capgemini Companies, as detailed in Section 1 and set out on the Capgemini website.



## 7. Data Subjects requests handling procedure

Where acting as Processor, Capgemini shall promptly forward any Data Subject request it receives to the Controller without undue delay. Capgemini shall then await the instructions of the Controller as to how to proceed, unless otherwise agreed between the parties in the Service Agreement.

Although Capgemini encourages Data Subjects to contact the Controller directly, it still allows them to submit requests and/or complaints through the dedicated internal mechanism described in Appendix 4.

## 8. Capgemini data protection organisation

The Data Protection Officers, part the Data Protection organisation depicted in Appendix 3, monitor the legal compliance to the Applicable DP Law of the Capgemini Company within their scope, advise in all matters that relate to data protection, implement the global data protection program, handle or advise on Data Breaches and have an active relationship with the local Supervisory Authority.

As part of the Legal function, Global, Regional and Local Data Protection Officers are supported in their task by the local legal teams. The Data Protection Officers report quarterly to the local country board or Executive Comity on privacy related matters such as critical Data Breaches, Data Subject Requests, privacy issues in large deals etc.

In addition to this regulatory role, the Group, Regional and Local DPOs act as business facilitators by validating the Capgemini approach to data protection and data security. The Group, Regional and Local DPO also have a key role in helping the business identify new business opportunities by identifying the gap between the strict data privacy legal requirements with which Capgemini must comply and the requirements defined by clients that might warrant additional offers.

In practice, this means that the Data Protection organisation should be consulted in any and all new projects to ensure that such new projects embed data protection constraints in the design phase. In addition, to support the business further the Group DPO will provide templates and procedures to make sure that the data protection constraints are taken into account by default in the different offers and services.

The Data Protection Officer network is completed by a network of Data Protection Champions who represent each Group function and each Global Business Line. Data Protection Champions are not part of the legal organisation but were designated amongst Group Functions and Global Business Lines representatives to ensure that the legal constraints and Group guidance are actually reflected at each level of the organisation. More importantly, the Data Protection Champions liaise with the Data Protection organisation to make sure the program properly integrates business needs and expectations.

Finally, it must be noted that the Data Protection organisation works closely with the Group Cybersecurity Officer and the Cybersecurity Organisation.

## 9. Data protection awareness and training

Capgemini has adopted and implemented a mandatory data protection training program to ensure that all Capgemini Employees are aware of and understand the key principles and requirements of data protection, as well as these BCR.

The training program, which is defined in a dedicated document internal to Capgemini, is articulated around the following pillars:

- General Training: A common core knowledge describing the applicable principles when Processing Personal Data;
- Practical Training: An overview of the existing applicable policies and processes;
- Functions Training: Tailor-made training designed to address the needs of specific functions (such as HR or marketing for instance).

In addition to the mandatory training, Capgemini is committed to promoting the implementation of data protection principles within the Group's organisation through a set of privacy by design policies and communication actions dedicated to raising awareness among the different Capgemini communities.

## 10. Privacy by design

Where acting as Processor, Capgemini shall provide the Controller with the necessary information to help them comply with their own obligations.

### 10.1 Record of Processing

Where acting as Processor, Capgemini must keep and maintain, in writing, a record of all categories of Processing activities carried out on behalf of Controllers, containing the following:

- The name and contact details of the Capgemini Company acting as Processor, and of each Controller on behalf of which Capgemini is acting, as well as the DPO;
- The categories of Processing carried out on behalf of the Controller;
- Where possible, a general description of the technical and organisational measures implemented.

Capgemini shall make the record available to the competent Supervisory Authority upon request.

**In practice**, to comply with this requirement, Capgemini uses dedicated tools which allow it to digitally record all Personal Data Processing and extract a complete record of Processing for its Processor's activities.

### 10.2 Data Protection Impact Assessment

Where acting as Processor, Capgemini is to assist the Controller to comply with its obligation to carry out Data Protection Impact Assessments.

**In practice**, this means that Capgemini shall provide the Controller with all relevant information regarding the Processing. In particular, the technical and organisational means used to implement the Processing, the location of the Data, the security measures implemented (physical and technical), and where applicable, details on the sub-Processor(s), etc. This shall not mean that Capgemini shall conduct the DPIA on behalf of the Controller. Capgemini shall only assist the Controller without committing on the performance of the DPIA *per se*.

## 11. Audits related to the BCR

Capgemini must carry out data protection audits covering all aspects of the BCR on a regular basis and according to our BCR and Data Protection audit program.

The audits shall be carried out either by internal or external qualified and independent auditors according to a schedule developed by the Group DPO on a yearly basis. In addition, the Global, Regional and Local DPOs can request that additional audits be carried out. Such audits may cover specific applications, IT systems or databases that process Personal Data; or may be carried out for an entire geography.

The audit report, including the proposed corrective actions to address and mitigate the risks, must be communicated to the Data Protection organisation and to the top management and shall be made available to the competent Supervisory Authority(ies) upon request.

In addition, where acting as Processor, Capgemini shall agree to be audited by Controllers regarding specific Processing activities carried out on their behalf. The conditions of such audits must be set out in the Service Agreement.

## 12. Capgemini's liability in case of a breach of the BCR

Where Capgemini is acting as Processor, the Controller, and in certain cases the Data Subject, as provided under Section 6, can enforce the BCR against any Capgemini Company for breaches it caused.

Where an EEA Capgemini Company transfers Personal Data to a Non-EEA Capgemini Company, the EEA Capgemini Company shall be liable for breaches caused by the Non-EEA Capgemini Company.

In all other cases ((1) transfers from an EEA Capgemini Company to another EEA Capgemini Company; (2) transfers between two Non-EEA Companies; or (3) transfers from a Non-EEA Company to an EEA Company) each Capgemini Company shall be liable for a breach of the BCR it caused.

**In practice**, this means that, in case of a breach of the BCR, the exporting EEA Capgemini Company must accept responsibility for paying compensation and to remedy the breach of the BCR where such breach caused a damage to the Controller and/or to Data Subjects.

Please find the full list of Capgemini Companies, including contact details, under Appendix 1.

In addition, it shall be up to Capgemini to demonstrate that it did not breach the BCR.

## 13. Jurisdiction

In case of a breach of any rights guaranteed under the BCR, Capgemini encourages Data Subjects to use the dedicated complaint handling procedure described in Section 7.

However, Data Subjects are also entitled to lodge a complaint before the competent Supervisory Authority – which can either be that of the EU Member State of their habitual residence, place of work or place of the alleged infringement.

In addition, Data Subjects can lodge a complaint before the competent court of law.

Where the Processing is carried out by a Non-EEA Capgemini Company, the Data Subject can lodge a complaint before the competent court of law according to the applicable legislation; unless the Non-EEA Capgemini Company is subject to the GDPR in which case the above provisions shall apply.

## 14. Applicable DP Law and potential conflicts with the BCR

Where Applicable DP Law requires a higher level of protection for Personal Data, it shall take precedence over the BCR. In any case, Personal Data will be processed in compliance with the Applicable DP Law.

Where a Capgemini Company, acting as Processor, has reasons to believe that the applicable local legislation prevents it to fulfil its obligations under the BCR, it must inform the Controller, Capgemini's headquarters as well as the DPO organisation and the Supervisory Authority competent for the Controller; unless prohibited to do so by a law enforcement authority.

In addition, any legally binding request for disclosure of Personal Data by a law enforcement authority or state security body must be notified to the Controller unless strictly prohibited.

In any case Capgemini will use its best efforts to alert the competent Supervisory Authority for the Controller as well as its own competent Supervisory Authority and provide them with information regarding the request for disclosure.

Section 16 below provides further information on how Capgemini shall manage any Personal Data access request issued by third countries public authorities.

## 15. Transfer impact assessments

Capgemini EEA Companies shall only Transfer Personal Data to non-EEA Capgemini Companies established in a third country pursuant to the BCR with the prior authorization of the Controller and where they have assessed that the laws and practices of such third country do not prevent the non-EEA Capgemini Company to which the Personal Data is transferred to from fulfilling its obligations under the BCR.

The assessment of the third country laws and practices shall be made under the assumption that such laws and practices respect the essence of the fundamental rights and freedoms and do not exceed what is necessary and proportionate in a democratic society to safeguard one of the objectives of public interest.

In practice, where conducting a Transfer Impact Assessment (TIA), the Controller and the Capgemini EEA Company shall consider:

- (i) The specific circumstances of the Transfer(s) or set of Transfers and of any envisaged onward transfer(s) within the same third country or to another third country, including:
  - a. The purposes for which the data are transferred and processed (e.g. HR, IT support, etc.);
  - b. The types of entities involved in the Transfer;
  - c. The economic sector in which the Transfer or set of Transfers occur;
  - d. The categories and format of the Personal Data transferred;
  - e. The location of the processing including storage; and
  - f. The transmission channels used.
- (ii) The laws and practices of the third country of destination relevant in light of the circumstances of the Transfer, including those requiring to disclose Personal Data to public authorities or authorising access by such authorities and those providing access to these Personal Data during the transfer, as well as the applicable limitations and safeguards.
- (iii) Any relevant contractual, technical or organizational safeguards implemented to supplement the safeguards under the BCR including measures applied during the transmission and to the processing of Personal Data in the country of destination.

Where the TIA shows that supplementary safeguards must be implemented in addition to those provided under the BCR and agreed between the parties under the Service Agreement, the Controller and the relevant EEA Capgemini Company(ies) shall define the appropriate supplementary measures to be implemented to safeguard the Transfer(s).

The Controller and the Capgemini EEA Company(ies) shall continuously monitor the laws and practices of third countries where Capgemini Companies are established and where Personal Data is transferred pursuant to the BCR, in order to identify any changes that would require the update of the TIAs and the implementation of supplementary safeguards.

Where a non-EEA Capgemini Company has reasons to believe that it has become subject to laws and practices that would prevent it from fulfilling its obligations under the BCR, it shall notify the Group

Data Protection Officer, to ensure that any Transfer of Personal Data to the third country where such non-EEA Capgemini Company is established benefits from the appropriate supplementary safeguards. The Data Protection Officer(s) of the non-EEA Capgemini Company shall support the Capgemini Company(ies) and the Client in identifying and implementing the appropriate supplementary measures.

Where a Capgemini Company and the Controller jointly determine that the BCR can no longer be complied with – even where supplementary measures have been implemented – for a specific Transfer or set of Transfers, or if instructed by the competent Supervisory Authority, they shall suspend such Transfer or set of Transfers until compliance can be achieved. If compliance with the BCR is not restored within one month of suspension, the Transfer or set of Transfers at stake shall end. Personal Data that were transferred prior to the suspension and copies thereof shall be returned or destroyed in their entirety at the choice of the EEA Capgemini Company.

Capgemini and the Controller shall document and record TIAs – including the nature of the supplementary safeguards that have been selected and implemented. Such documentation shall be made available to the competent Supervisory Authority upon request.

In practice, the assessments of laws and practices of third countries, as well as the specific TIAs conducted for a Transfer or set of Transfers and the supplementary safeguards identified and implemented, as well as all relevant documentation, shall be made available to all Capgemini Data Protection Officers. Thus, enabling Capgemini to ensure compliance with the BCR and consistency in the manner they are implemented throughout the group.

## 16. Management of access requests issued by third countries public authorities

Where legally permitted, a non-EEA Capgemini Company to which Personal Data are transferred under these BCR shall strive to notify the EEA Capgemini Company and/or the Controller which transferred such Personal Data and, where possible, the Data Subject(s) involved where it:

- (i) receives a legally binding request issued by a public authority for disclosure of Personal Data transferred pursuant to the BCR
- (ii) becomes aware of any direct access by the public authorities to Personal Data transferred pursuant to the BCR

Such notification shall include all information available to the non-EEA Capgemini Company, including in particular: the Personal Data request, the requesting authority, the legal basis for the request and the response provided.

Where prohibited from notifying the EEA Capgemini Company and/or the Controller and/or the Data Subjects involved, the non-EEA Capgemini Company shall use its best efforts to obtain a waiver of such prohibition to communicate as much information as possible and as soon as possible. It shall document such efforts to be able to demonstrate them upon request from the EEA Capgemini Company and/or the Controller.

Each Capgemini Company monitors and records, monthly, information regarding the requests to access Personal Data issued by public authorities it receives. Such information includes in particular:

- The number of requests
- The types of data requested
- The authority(ies) who issued the request

- Whether the requests have been challenged
- The outcome of such challenged

Capgemini Data Protection Officers shall have access to that information. Information regarding the access requests shall be preserved for as long as necessary and shall be made available to the competent Supervisory Authorities upon request.

Where a Capgemini Company is or becomes prohibited from reporting on the information listed above, it shall notify the Group Data Protection Officer without undue delay.

Where acting as Processor, Capgemini shall always ask the requestor to redirect their request to the Controller directly.

Capgemini shall systematically review the legality of a request to access or otherwise disclose Personal Data. Capgemini shall challenge such request if, after careful consideration, it determines that there are reasonable grounds to consider that the request is unlawful under applicable law, applicable obligations under international law, and principles of international comity. Capgemini shall, under the same conditions, pursue possibilities of appeal.

Where challenging a request, Capgemini will seek interim measures to suspend the effects of the request until the competent judicial authority has ruled on its merits. Capgemini shall not disclose the Personal Data requested until required to do so under the applicable procedural rules.

Where Capgemini is required to respond to the request, it shall provide the minimum amount of information permissible. In addition, any Transfer or set of Transfers carried out by Capgemini to comply with a request issued by a public authority shall not be massive, disproportionate, or indiscriminate in a manner that would go beyond what is necessary in a democratic society.

## 17. Cooperation duties

Where acting as Processor, Capgemini shall cooperate with and assist the Controller to help it comply with their obligations under the Applicable DP Law.

In addition, Capgemini must cooperate with the competent Supervisory Authority(ies) for the Controller, according to the Controller's instructions. In particular, Capgemini must follow the Supervisory Authority(ies)' advice and accept to be audited by them, in relation to the Processing activities performed on behalf of a specific Controller.

## 18. Easy access to the BCR

A public version of the BCR is made available on Capgemini's website as well as on the Capgemini Intranet.

In practice, the body of the public version of the BCR-P is identical to that of the internal version. However, there are some differences in the appendices. More specifically, the public version of the BCR-P is structured as follows:

- [The full body of the BCR-P](#)
- [Appendix 1 Capgemini companies bound by the BCR](#)
- [Appendix 2 Capgemini processing activities](#)
- [Appendix 3 Capgemini data protection organization](#)

## Public version – April 2023

- *Appendix 4 Data Subjects' requests handling procedure – this version of the procedure was drafted to inform the data subjects on how Capgemini is processing their data subject requests. The internal version of the BCR-Ps contains another version of the procedure which is meant to support the DPOs and operational to manage data subjects' requests.*

In addition, Capgemini shall send the public version of the BCR to the Controller upon request and/or attach it to the Service Agreement as agreed between the parties.

Where acting as Processor, Capgemini must ensure that a reference to the BCR is included in Service Agreements, together with a link to the public version of the BCR.



## 19. Updates of BCR

Capgemini must communicate an updated list of the Capgemini Companies to its lead Supervisory Authority, the CNIL, once a year.

Where Capgemini chooses to make substantial modifications to the BCR, to reflect new regulatory requirements or changes to its internal organisation for instance, it shall inform the CNIL as well as all the Capgemini Companies.

If such changes significantly affect the conditions of the Processing of Personal Data, Capgemini acting as Processor shall duly inform the Controllers.

## Appendix 1 – Capgemini companies bound by the BCR

France	
<b>Capgemini Service SAS</b> SIRET 65 202 579 200 084	11 rue de Tilsitt, 75017 Paris, France <a href="mailto:dpocapgemini.global@capgemini.com">dpocapgemini.global@capgemini.com</a>
<b>Capgemini SE</b> SIRET 33 070 384 400 036	11, rue de Tilsitt, 75017 Paris, France <a href="mailto:dpocapgemini.global@capgemini.com">dpocapgemini.global@capgemini.com</a>
<b>Capgemini Gouvieux SAS</b> SIRET 42 857 118 600 017	11 rue de Tilsitt, 75017 Paris, France <a href="mailto:dpocapgemini.global@capgemini.com">dpocapgemini.global@capgemini.com</a>
<b>Immobilière Les Fontaines SARL</b> SIRET 42 177 631 100 019	11 rue de Tilsitt, 75017 Paris, France <a href="mailto:dpocapgemini.global@capgemini.com">dpocapgemini.global@capgemini.com</a>
<b>SCI Paris Etoile</b> SIRET 33 133 855 800 033	11 rue de Tilsitt, 75017 Paris, France <a href="mailto:dpocapgemini.global@capgemini.com">dpocapgemini.global@capgemini.com</a>
<b>Capgemini Latin America SAS</b> SIRET 48 760 678 200 018	11 rue de Tilsitt, 75017 Paris, France <a href="mailto:dpocapgemini.global@capgemini.com">dpocapgemini.global@capgemini.com</a>
<b>Capgemini Ventures SAS</b> SIRET 44 033 009 000 018	11 rue de Tilsitt, 75017 Paris, France <a href="mailto:dpocapgemini.global@capgemini.com">dpocapgemini.global@capgemini.com</a>
<b>Sogeti France 2005 SAS</b> SIRET 48 760 757 400 018	11 rue de Tilsitt, 75017 Paris, France <a href="mailto:dpocapgemini.global@capgemini.com">dpocapgemini.global@capgemini.com</a>
<b>Sogeti SAS</b> SIRET 43 432 597 300 031	11 rue de Tilsitt, 75017 Paris, France <a href="mailto:dpocapgemini.global@capgemini.com">dpocapgemini.global@capgemini.com</a>
<b>Global Management Treasury Services S.N.C</b> SIRET 44 837 008 000 054	11 rue de Tilsitt, 75017 Paris, France <a href="mailto:dpocapgemini.global@capgemini.com">dpocapgemini.global@capgemini.com</a>
<b>Altran Participations SAS</b> SIRET 48 755 097 200 037	11 rue de Tilsitt, 75017 Paris, France <a href="mailto:dpofrance.fr@capgemini.com">dpofrance.fr@capgemini.com</a>
<b>Altran Technology &amp; Engineering Center SAS</b> SIRET 81 745 935 700 023	4 avenue Didier Daurat, 31700 Blagnac, France <a href="mailto:dpofrance.fr@capgemini.com">dpofrance.fr@capgemini.com</a>
<b>Capgemini France SAS</b> SIRET 32 878 178 601 143	145-151 Quai du Président Roosevelt –92130 Issy-les-Moulineaux, France <a href="mailto:dpofrance.fr@capgemini.com">dpofrance.fr@capgemini.com</a>
<b>Capgemini Consulting SAS</b> SIRET 47 976 680 000 060	145-151 Quai du Président Roosevelt –92130 Issy-les-Moulineaux, France <a href="mailto:dpofrance.fr@capgemini.com">dpofrance.fr@capgemini.com</a>
<b>Open Cascade SAS</b> SIRET 42 091 980 500 093	1 place des Frères Montgolfier, 78280 Guyancourt, France <a href="mailto:dpofrance.fr@capgemini.com">dpofrance.fr@capgemini.com</a>
<b>Capgemini Technology Services SAS</b> SIRET 47 976 684 200 724	145-151 Quai du Président Roosevelt –92130 Issy-les-Moulineaux, France <a href="mailto:dpofrance.fr@capgemini.com">dpofrance.fr@capgemini.com</a>
<b>Capgemini Engineering Research &amp; Development SAS</b> SIRET 44 449 577 400 531	145-151 Quai du Président Roosevelt –92130 Issy-les-Moulineaux, France <a href="mailto:dpofrance.fr@capgemini.com">dpofrance.fr@capgemini.com</a>
<b>French Bureau SAS</b> SIRET 82 217 266 400 036	17 rue Bouchardon, 75010 Paris, France <a href="mailto:dpofrance.fr@capgemini.com">dpofrance.fr@capgemini.com</a>
<b>Altran ACT SAS</b> SIRET 81 754 920 300 026	145-151 Quai du Président Roosevelt, 92130 Issy-les-Moulineaux, France <a href="mailto:dpofrance.fr@capgemini.com">dpofrance.fr@capgemini.com</a>

<b>Altran Allemagne SAS</b> SIRET 51 909 304 100 043	76 avenue de Kleber, 75016 Paris, France <a href="mailto:dpofrance.fr@capgemini.com">dpofrance.fr@capgemini.com</a>
<b>Altran Connected Solutions SAS</b> SIRET 49 337 888 900 056	145-151 Quai du Président Roosevelt, 92130 Issy-les-Moulineaux, France <a href="mailto:dpofrance.fr@capgemini.com">dpofrance.fr@capgemini.com</a>
<b>Altran Education Services SAS</b> SIRET 43 203 785 100 115	145-151 Quai du Président Roosevelt, 92130 Issy-les-Moulineaux, France <a href="mailto:dpofrance.fr@capgemini.com">dpofrance.fr@capgemini.com</a>
<b>Altran Lab SAS</b> SIRET 44 939 756 100 043	145-151 Quai du Président Roosevelt, 92130 Issy-les-Moulineaux, France <a href="mailto:dpofrance.fr@capgemini.com">dpofrance.fr@capgemini.com</a>
<b>Altran Prototypes Automobiles SAS</b> SIRET 48 754 969 300 025	145-151 Quai du Président Roosevelt, 92130 Issy-les-Moulineaux, France <a href="mailto:dpofrance.fr@capgemini.com">dpofrance.fr@capgemini.com</a>
<b>Altran Technologies SAS</b> SIRET 70 201 295 600 935	76 avenue Kleber, 75016 Paris, France <a href="mailto:dpofrance.fr@capgemini.com">dpofrance.fr@capgemini.com</a>
<b>Logiquail SAS</b> SIRET 48 755 068 300 030	4 avenue Didier Daurat, 31700 Blagnac, France <a href="mailto:dpofrance.fr@capgemini.com">dpofrance.fr@capgemini.com</a>

North Africa	
<b>Capgemini Technology Services Maroc SA</b> 164141	Shore 8 – A – Casanearshore – 1 100, Boulevard Al Qods – Sidi Maârouf - Casablanca, Morocco <a href="mailto:dpomaroc.fr@capgemini.com">dpomaroc.fr@capgemini.com</a>
<b>Altran Maroc SARLU</b> 289225	1100 boulevard Al Qods, Casanearshore, Shore 17, Quartier Sidi Maârouf, 20270, Casablanca, Morocco <a href="mailto:dpomaroc.fr@capgemini.com">dpomaroc.fr@capgemini.com</a>
<b>Capgemini Egypt LLC</b> 183227	Level 4, Plot 202, 2nd Sector, 5th Settlement New Cairo, Egypt <a href="mailto:dpo.in@capgemini.com">dpo.in@capgemini.com</a>
<b>Altran Telnet Corporation, S.A.</b>	Centre urbain Nord, Immeuble Ennour 1082 Tunis El Mahrajène, Tunisia <a href="mailto:dpofrance.fr@capgemini.com">dpofrance.fr@capgemini.com</a>

UK & Ireland	
<b>Capgemini UK Plc</b> 0943935	No.1 Forge End – Woking GU21 6DB, UK <a href="mailto:dpocapgemini.uk@capgemini.com">dpocapgemini.uk@capgemini.com</a>
<b>CGS Holdings Limited</b> 02798276	No.1 Forge End – Woking GU21 6DB, UK <a href="mailto:dpocapgemini.uk@capgemini.com">dpocapgemini.uk@capgemini.com</a>
<b>Capgemini Financial Services UK Limited</b> 03282049	No.1 Forge End – Woking GU21 6DB, UK <a href="mailto:dpocapgemini.uk@capgemini.com">dpocapgemini.uk@capgemini.com</a>
<b>Sogeti UK Limited</b> 04268004	No.1 Forge End – Woking GU21 6DB, UK <a href="mailto:dpocapgemini.uk@capgemini.com">dpocapgemini.uk@capgemini.com</a>
<b>Restaurant Application Development International UK Limited</b> 07363730	30 Finsbury Square, London, EC2A 1AG, UK <a href="mailto:dpocapgemini.uk@capgemini.com">dpocapgemini.uk@capgemini.com</a>
<b>Idean Capgemini Creative Studios UK Limited</b> 06934128	30 Finsbury Square, London, EC2A 1AG, UK <a href="mailto:dpocapgemini.uk@capgemini.com">dpocapgemini.uk@capgemini.com</a>
<b>IGATE Computer Systems (UK) Limited</b> 02859908	No.1 Forge End – Woking GU21 6DB, UK <a href="mailto:dpocapgemini.uk@capgemini.com">dpocapgemini.uk@capgemini.com</a>
<b>IGATE Information Services (UK) Limited</b> 04276081	30 Finsbury Square, London, EC2A 1AG, UK <a href="mailto:dpocapgemini.uk@capgemini.com">dpocapgemini.uk@capgemini.com</a>
<b>Capgemini Ireland Limited</b> 67792	Ground Floor, Metropolitan Building, James Joyce Street, Dublin 1, Ireland <a href="mailto:dpocapgemini.uk@capgemini.com">dpocapgemini.uk@capgemini.com</a>
<b>Aricent Ireland, Private Limited</b> 546416	C/o Moore Ireland, 3rd Floor, Ulysses House, Foley Street, Ireland <a href="mailto:dpocapgemini.uk@capgemini.com">dpocapgemini.uk@capgemini.com</a>
<b>Purpose Europe Limited</b> 08340026	Raleigh House 14c Compass Point Business Pk, Stocks Bridge Way, St Ives, Cambridgeshire, PE27 5JL, UK <a href="mailto:dpocapgemini.uk@capgemini.com">dpocapgemini.uk@capgemini.com</a>
<b>ECSI Consulting Limited</b> 08871329	No.1 Forge End – Woking GU21 6DB, UK <a href="mailto:dpocapgemini.uk@capgemini.com">dpocapgemini.uk@capgemini.com</a>
<b>Altran UK Limited</b> 03066512	No.1 Forge End – Woking GU21 6DB, UK <a href="mailto:dpocapgemini.uk@capgemini.com">dpocapgemini.uk@capgemini.com</a>
<b>Altran UK Holding Limited</b> 03066512	No.1 Forge End – Woking GU21 6DB, UK <a href="mailto:dpocapgemini.uk@capgemini.com">dpocapgemini.uk@capgemini.com</a>
<b>Cambridge Consultants Limited</b> 01036298	Milton Road, Science Park – Unit 29 CB4 0DW, Cambridge, UK <a href="mailto:dpocapgemini.uk@capgemini.com">dpocapgemini.uk@capgemini.com</a>

<b>Frog Design Group UK Limited</b> 09436565	No.1 Forge End – Woking GU21 6DB, UK <a href="mailto:dpocapgemini.uk@capgemini.com">dpocapgemini.uk@capgemini.com</a>
<b>Information Risk Management Limited</b> 03612719	No.1 Forge End – Woking GU21 6DB, UK <a href="mailto:dpocapgemini.uk@capgemini.com">dpocapgemini.uk@capgemini.com</a>
<b>Tessella Limited</b> 01466429	26 The Quadrant, Abingdon Science Park, OX14 3YS, Abingdon, UK <a href="mailto:dpocapgemini.uk@capgemini.com">dpocapgemini.uk@capgemini.com</a>
<b>Capgemini Certifications UK Limited</b> 08126402	No.1 Forge End – Woking GU21 6DB, UK <a href="mailto:dpocapgemini.uk@capgemini.com">dpocapgemini.uk@capgemini.com</a>
<b>Aricent Technologies UK, Limited</b> 06140181	30 Finsbury Square, EC2A 1AG London, UK <a href="mailto:dpocapgemini.uk@capgemini.com">dpocapgemini.uk@capgemini.com</a>

#### BeNeLux

<b>Capgemini Nederland BV</b> 30053172	Reykjavikplein 1, 3543 KA Utrecht, The Netherlands <a href="mailto:dpocapgemini.nl@capgemini.com">dpocapgemini.nl@capgemini.com</a>
<b>Capgemini NV</b> 30067608	Reykjavikplein 1, 3543 KA Utrecht, The Netherlands <a href="mailto:dpocapgemini.nl@capgemini.com">dpocapgemini.nl@capgemini.com</a>
<b>Capgemini Business Services BV</b> 33030578	Reykjavikplein 1, 3543 KA Utrecht, The Netherlands <a href="mailto:dpocapgemini.nl@capgemini.com">dpocapgemini.nl@capgemini.com</a>
<b>Capgemini International BV</b> 33268283	Reykjavikplein 1, 3543 KA Utrecht, The Netherlands <a href="mailto:dpocapgemini.nl@capgemini.com">dpocapgemini.nl@capgemini.com</a>
<b>Capgemini Educational Services BV</b> 30197497	Reykjavikplein 1, 3543 KA Utrecht, The Netherlands <a href="mailto:dpocapgemini.nl@capgemini.com">dpocapgemini.nl@capgemini.com</a>
<b>Capgemini Sourcing BV</b> 30135992	Reykjavikplein 1, 3543 KA Utrecht, The Netherlands <a href="mailto:dpocapgemini.nl@capgemini.com">dpocapgemini.nl@capgemini.com</a>
<b>Sogeti Nederland BV</b> 30200252	Lange Dreef 17 – 4131 NJ Vianen – The Netherlands <a href="mailto:dpocapgemini.nl@capgemini.com">dpocapgemini.nl@capgemini.com</a>
<b>Altran Engineering BV</b> 17122872	59 Automotive Campus, 5708JZ Helmond, The Netherlands <a href="mailto:dpocapgemini.nl@capgemini.com">dpocapgemini.nl@capgemini.com</a>
<b>Altran International BV</b> 33294562	1 Reykjavikplein, 3543KA, Utrecht, The Netherlands <a href="mailto:dpocapgemini.nl@capgemini.com">dpocapgemini.nl@capgemini.com</a>
<b>Altran Netherlands BV</b> 34106539	1 Reykjavikplein, 3543KA, Utrecht, The Netherlands <a href="mailto:dpocapgemini.nl@capgemini.com">dpocapgemini.nl@capgemini.com</a>
<b>Capgemini Belgium SA/NV</b> 0407.184.521	Bessenveldstraat 19 – 1831 Diegem, Belgium <a href="mailto:dpocapgemini.be@capgemini.com">dpocapgemini.be@capgemini.com</a>

<b>Sogeti Luxembourg</b> B42610	36 Route de Longwy- 8080 Bertrange – Luxembourg <a href="mailto:dpocapgemini.lu@capgemini.com">dpocapgemini.lu@capgemini.com</a>
<b>Capgemini Reinsurance International SA</b> 163.854	534 rue de Neudorf, 2220 Luxemburg <a href="mailto:dpocapgemini.lu@capgemini.com">dpocapgemini.lu@capgemini.com</a>
<b>Altran Luxembourg SA</b> B65221	36 Route de Longwy- 8080 Bertrange – Luxembourg <a href="mailto:dpocapgemini.lu@capgemini.com">dpocapgemini.lu@capgemini.com</a>

Central Europe	
<b>Capgemini Deutschland Holding GmbH</b> HRB 102576	Potsdamer Platz 5, D-10785 Berlin, Germany <a href="mailto:dpocapgemini.de@capgemini.com">dpocapgemini.de@capgemini.com</a>
<b>Capgemini Outsourcing Services GmbH</b> HRB 58881	Balcke-Dürr-Allee 7, 40882 Ratingen, Germany <a href="mailto:dpocapgemini.de@capgemini.com">dpocapgemini.de@capgemini.com</a>
<b>Capgemini Deutschland GmbH</b> HRB 98814	Potsdamer Platz 5, D-10785 Berlin, Germany <a href="mailto:dpocapgemini.de@capgemini.com">dpocapgemini.de@capgemini.com</a>
<b>Capgemini Deutschland Services GmbH</b> HRB 215542 B	Potsdamer Platz 5, D-10785 Berlin, Germany <a href="mailto:dpocapgemini.de@capgemini.com">dpocapgemini.de@capgemini.com</a>
<b>Sogeti Deutschland GmbH</b> HRB 49963	Balcke-Dürr-Allee 7, 40882 Ratingen, Germany <a href="mailto:dpocapgemini.de@capgemini.com">dpocapgemini.de@capgemini.com</a>
<b>XL2 GmbH</b> 773865	Potsdamer Platz 5, 10785 Berlin, Germany <a href="mailto:xl2-dpo.de@capgemini.com">xl2-dpo.de@capgemini.com</a>
<b>Altran Deutschland SAS &amp; Co. KG</b> HRA 100894	81 Frankfurter Ring 80807, München, Germany <a href="mailto:dpocapgemini.de@capgemini.com">dpocapgemini.de@capgemini.com</a>
<b>Altran Service GmbH</b> HRA 89337	81 Frankfurter Ring 80807, München, Germany <a href="mailto:dpocapgemini.de@capgemini.com">dpocapgemini.de@capgemini.com</a>
<b>Frog Design Europe GmbH</b> HRB 245808	55 Leopoldstrasse, 80802, München, Germany <a href="mailto:dpocapgemini.de@capgemini.com">dpocapgemini.de@capgemini.com</a>
<b>Altran Management SE</b> HRB 103091	Hamburger Allee 2-4, 60486 Frankfurt am Main, Germany <a href="mailto:dpocapgemini.de@capgemini.com">dpocapgemini.de@capgemini.com</a>
<b>Aricent Technologies Germany GmbH</b> HRB 32026	Neumeyerstr. 22-50, 90411 Nürnberg, Germany <a href="mailto:dpocapgemini.de@capgemini.com">dpocapgemini.de@capgemini.com</a>
<b>Capgemini Consulting Österreich AG</b> FN 194903y	Millennium Tower, 22nd Floor, Handelskai 94-96, 1200 Wien, Austria <a href="mailto:dpo.request.at@capgemini.com">dpo.request.at@capgemini.com</a>
<b>Altran Austria GmbH</b> FN 287997 a	1 Concept Strasse, A-8101 Gratkom, Austria <a href="mailto:dpo.request.at@capgemini.com">dpo.request.at@capgemini.com</a>
<b>Capgemini Suisse S.A.</b> CH-290.3.006.037-8	World Trade Center, Leutschenbachstrasse 95, CH 8050 Zurich, Switzerland <a href="mailto:dpocapgemini.ch@capgemini.com">dpocapgemini.ch@capgemini.com</a>
<b>Capgemini Polska Sp. z.o.o</b> KRS 0000040605	Ul. Żwirki i Wigury 16a, 02092 Warsaw, Poland <a href="mailto:dprequestpoland.pl@capgemini.com">dprequestpoland.pl@capgemini.com</a>
<b>Altran Polska Sp. z.o.o</b> KRS 0000396882	ul. Towarowa, 00-839 Warszawa, Poland <a href="mailto:dprequestpoland.pl@capgemini.com">dprequestpoland.pl@capgemini.com</a>

Northern Europe	
<b>Capgemini Sverige AB</b> 556092-3053	Fleminggatan 18 (6th floor), 112 26 Bromma, Sweden <a href="mailto:dldposweden.se@capgemini.com">dldposweden.se@capgemini.com</a>
<b>Capgemini AB</b> 556447-9763	Fleminggatan 18 (6th floor), 112 26 Bromma, Sweden <a href="mailto:dldposweden.se@capgemini.com">dldposweden.se@capgemini.com</a>
<b>Sogeti Sverige AB</b> 556631-4687	Svetsarvägen 4, 171 41 Solna, Sweden <a href="mailto:dldposweden.se@capgemini.com">dldposweden.se@capgemini.com</a>
<b>Altran Sverige AB</b> 556542-2531	37 Södra Hamngatan, SE 411 06 Göteborg, Sweden <a href="mailto:dldposweden.se@capgemini.com">dldposweden.se@capgemini.com</a>
<b>Aricent Technologies Sweden AB</b> 556786-2866	c/o TMF Sweden AB, Sergels Torg 12, 111 57 Stockholm, Sweden <a href="mailto:dldposweden.se@capgemini.com">dldposweden.se@capgemini.com</a>
<b>Capgemini Denmark A/S</b> 25606965	Delta Park 40, 2665 Vallensbaeck Strand, Denmark <a href="mailto:privacy.dk@capgemini.com">privacy.dk@capgemini.com</a>
<b>Altran Denmark APS</b> 31605466	7 Philip Heymans Alle, C/o Horten Advokatpartnerskab, DK62900 Hellerup, Denmark <a href="mailto:privacy.dk@capgemini.com">privacy.dk@capgemini.com</a>
<b>Capgemini Finland Oy</b> 1628142-5	Keilaranta 10 E – 02150 Espoo, Finland <a href="mailto:dpofinland.fi@capgemini.com">dpofinland.fi@capgemini.com</a>
<b>Capgemini Norge A/S</b> 943574537	Karenslyst allé 20, 0213 Oslo, Norway <a href="mailto:dponorway.no@capgemini.com">dponorway.no@capgemini.com</a>
<b>Matiq AS</b> 985149437	Abels gate 7, 7030 Trondheim, Norway <a href="mailto:dponorway.no@capgemini.com">dponorway.no@capgemini.com</a>

Southern Europe	
<b>Capgemini España S.L</b> M-287781	Calle Puerto de Somport, Edificio Oxxeo, CP 28050, Madrid, Spain <a href="mailto:protecciondedatos.es@capgemini.com">protecciondedatos.es@capgemini.com</a>
<b>Agencia de Certification en Innovacion Espanola SLU</b> B-82.271.313	En calle Campezo 1, edificio 4, planta 0, 28022 Madrid, Spain <a href="mailto:protecciondedatos.es@capgemini.com">protecciondedatos.es@capgemini.com</a>
<b>Altran Innovacion SLU</b> B-80428972	Avenida Diagonal, 199, 08018 Barcelona, Spain <a href="mailto:protecciondedatos.es@capgemini.com">protecciondedatos.es@capgemini.com</a>
<b>Ecosat Airships SL</b> B-47.794.425	C. Nicostrato Vela, 20, 24009 León, Spain <a href="mailto:protecciondedatos.es@capgemini.com">protecciondedatos.es@capgemini.com</a>
<b>Aricent Spain SA</b> B-66.541.772	11 Travessera de Gràcia, 5 <sup>th</sup> Floor, 08021 Barcelona, Spain <a href="mailto:protecciondedatos.es@capgemini.com">protecciondedatos.es@capgemini.com</a>
<b>Capgemini Portugal SA</b> 504272179	Av. Colégio Militar, 37 - Torre Colombo Oriente, Piso 10 - 1500-180 Lisboa, Portugal <a href="mailto:dp.pt@capgemini.com">dp.pt@capgemini.com</a>
<b>Capgemini Italia S.p.A</b> 4877961005	Via di Torre Spaccata, 140 - 00169 Roma, Italy <a href="mailto:dataprivacy.it@capgemini.com">dataprivacy.it@capgemini.com</a>



Southern Europe	
<b>CAPGEMINI FINANCE TECH S.R.L.</b> 16239151000	Via di Torre Spaccata, 140 - 00173 Roma, Italy <a href="mailto:dataprivacy.it@capgemini.com">dataprivacy.it@capgemini.com</a>

Eastern Europe	
<b>Lohika LTD</b> 37413934	50 Prakhovykh Simi Str., 01033 Kyiv, Ukraine <a href="mailto:dpo.ukr@capgemini.com">dpo.ukr@capgemini.com</a>
<b>Altran Slovakia, S.R.O.</b> 46655956	Piešťanská 3, 917 01 Trnava, Slovakia <a href="mailto:dpocapgemini.nl@capgemini.com">dpocapgemini.nl@capgemini.com</a>
<b>Altran Romania, S.R.L.</b> 28381169	21 Garii street, Building E - Liberty Technology Park, 3rd floor 400267 Cluj-Napoca, Romania <a href="mailto:dpocapgemini.ro@capgemini.com">dpocapgemini.ro@capgemini.com</a>
<b>CAPGEMINI SERVICES ROMANIA S.R.L</b> J40/22612/2007	Gara Herastrau Street, no. 4D, Green Court building, 4th floor Bucharest, Sector 2, Romania <a href="mailto:dpocapgemini.ro@capgemini.com">dpocapgemini.ro@capgemini.com</a>
<b>CAPGEMINI CZECH REPUBLIC S.R.O.</b> 260 33 062	5. května 1746/22, 140 00 Praha 4-Nusle, Česko, Czech Republic <a href="mailto:dpo.cz@capgemini.com">dpo.cz@capgemini.com</a>
<b>Altran CZ, A.S.</b> B3416	2071 Příčná, 508 01 Hořice , Czech Republic <a href="mailto:dpo.cz@capgemini.com">dpo.cz@capgemini.com</a>
<b>CAPGEMINI MAGYARORSZÁG Kft</b> 13-09-087168	Rétköz utca 5, HU-1118 Budapest, Hungary <a href="mailto:dpocapgemini.hu@capgemini.com">dpocapgemini.hu@capgemini.com</a>
<b>RESTAURANT APPLICATION DEVELOPMENT INTERNATIONAL HUNGARY</b>	Árpád fejedelem útja 26-28., 1023 Budapest, Hungary <a href="mailto:Dpocapgemini.hu@capgemini.com">Dpocapgemini.hu@capgemini.com</a>

APAC	
<b>Capgemini Australia Pty Ltd</b> ACN 092 284 314	Level 7, 77 King Street, Sydney NSW 2000, Australia <a href="mailto:privacy.au@capgemini.com">privacy.au@capgemini.com</a>
<b>WhiteSky Labs Pty Ltd</b> ACN 141 042 382	Suite 1105, 50 Clarence Street, Sydney, NSW 2000 Australia <a href="mailto:privacy.au@capgemini.com">privacy.au@capgemini.com</a>
<b>RXP Services Limited</b> ACN 146 959 917	Level 15, 31 Queen Street, 3000 Melbourne, Victoria, Australia <a href="mailto:privacy.au@capgemini.com">privacy.au@capgemini.com</a>
<b>The Worksmelbourne Agency Pty Ltd</b> ACN 120 388 436	Level 15, 31 Queen Street, 3000 Melbourne, Victoria, Australia <a href="mailto:privacy.au@capgemini.com">privacy.au@capgemini.com</a>
<b>The Workssydney Pty Ltd</b> ACN 102 213 794	Level 15, 31 Queen Street, 3000 Melbourne, Victoria, Australia <a href="mailto:privacy.au@capgemini.com">privacy.au@capgemini.com</a>
<b>NSI Technology Pty Ltd</b> ACN 126 122 272	Level 15, 31 Queen Street, 3000 Melbourne, Victoria, Australia <a href="mailto:privacy.au@capgemini.com">privacy.au@capgemini.com</a>
<b>Daresay Pty Ltd</b> ACN 610 783 312	Level 15, 31 Queen Street, 3000 Melbourne, Victoria, Australia <a href="mailto:privacy.au@capgemini.com">privacy.au@capgemini.com</a>
<b>Acclimation Pty Ltd</b> ACN 152 878 398	Level 7, 77 King Street, NSW 2000 Sydney, Australia <a href="mailto:privacy.au@capgemini.com">privacy.au@capgemini.com</a>
<b>Empired Limited</b> ACN 090 503 843	Level 7, The Quadrant, 1 William Street, Perth WA 6000, Australia <a href="mailto:privacy.au@capgemini.com">privacy.au@capgemini.com</a>
<b>Conducive Pty Ltd</b> ACN 119 878 143	Level 7, The Quadrant, 1 William Street, Perth WA 6000, Australia <a href="mailto:privacy.au@capgemini.com">privacy.au@capgemini.com</a>
<b>Tusk Technologies PTY Ltd</b> ACN 094 777 376	Level 7, The Quadrant, 1 William Street, Perth WA 6000, Australia <a href="mailto:privacy.au@capgemini.com">privacy.au@capgemini.com</a>
<b>OBS PTY Ltd</b> ACN 081 252 922	Level 7, The Quadrant, 1 William Street, Perth WA 6000, Australia <a href="mailto:privacy.au@capgemini.com">privacy.au@capgemini.com</a>
<b>Esavvy PTY Ltd</b> ACN 138 682 148	Level 7, The Quadrant, 1 William Street, Perth WA 6000, Australia <a href="mailto:privacy.au@capgemini.com">privacy.au@capgemini.com</a>
<b>Intergen Business Solutions PTY Ltd</b> ACN 142 682 148	Level 7, The Quadrant, 1 William Street, Perth WA 6000, Australia <a href="mailto:privacy.au@capgemini.com">privacy.au@capgemini.com</a>
<b>Purpose Asia Pacific Pty Ltd</b> ACN 625 798 807	Level 7, The Quadrant, 1 William Street, Perth WA 6000, Australia <a href="mailto:privacy.au@capgemini.com">privacy.au@capgemini.com</a>
<b>Altran Australia Property Limited</b> 602543519	C/o Grant Thornton Australia Limited, Level 17, 383 Kent Street NSW 2000 Sydney, Australia <a href="mailto:privacy.au@capgemini.com">privacy.au@capgemini.com</a>
<b>Capgemini New Zealand Limited (formerly known as Intergen Limited)</b>	Level 4, 80 Willis Street, Wellington, 6011 New Zealand <a href="mailto:privacy.au@capgemini.com">privacy.au@capgemini.com</a>

<b>Intergen ESS Limited</b>	Level 4, 80 Willis Street, Wellington, 6011New Zealand <a href="mailto:privacy.au@capgemini.com">privacy.au@capgemini.com</a>
<b>Capgemini Singapore Pte Ltd</b> 199106419N	Level 32, 12 Marina Boulevard, Marina Bay Financial Centre– Singapore 018982, Singapore <a href="mailto:dpo.sg@capgemini.com">dpo.sg@capgemini.com</a>
<b>Capgemini Asia Pacific Ltd</b> 199602754G	Level 32, 12 Marina Boulevard, Marina Bay Financial Centre– Singapore 018982, Singapore <a href="mailto:dpo.sg@capgemini.com">dpo.sg@capgemini.com</a>
<b>Liquidhub Pte. Ltd.</b> 201703318C	Level 32, 12 Marina Boulevard, Marina Bay Financial Centre – Singapore 018982, Singapore <a href="mailto:dpo.sg@capgemini.com">dpo.sg@capgemini.com</a>
<b>Acclimation PTE. Ltd</b> 201619606D	Level 32, 12 Marina Boulevard, Marina Bay Financial Centre– Singapore 018982, Singapore <a href="mailto:dpo.sg@capgemini.com">dpo.sg@capgemini.com</a>
<b>Altran Singapore Private Limited</b> 200106758M	4 Battery Road #25-01 Bank of China Building, 049908 Singapore <a href="mailto:dpo.sg@capgemini.com">dpo.sg@capgemini.com</a>
<b>Cambridge Consultants Singapore Private Limited</b> 201230536C	4 Battery Road #25-01 Bank of China Building, 049908 Singapore <a href="mailto:dpo.sg@capgemini.com">dpo.sg@capgemini.com</a>
<b>Frog Strategy &amp; Design Private Limited</b> 201333973K	38 Beach Road, #29-11 South Beach Tower, 189767 Singapore <a href="mailto:dpo.sg@capgemini.com">dpo.sg@capgemini.com</a>
<b>CAPGEMINI BUSINESS SERVICES (CHINA) LIMITED</b> 440101400083545	6/F Podium, Glory IFC, No. 25 Ronghe Road, 528200 Nanhai District, Foshan City, PRC, China <a href="mailto:dpo.cn@capgemini.com">dpo.cn@capgemini.com</a>
<b>CAPGEMINI (CHINA) CO, LTD</b> 310115400049352	Room A256, Floor 2, Building 3, 2250 South Pudong Road, Pilot Free Trade Zone, Shanghai, China <a href="mailto:dpo.cn@capgemini.com">dpo.cn@capgemini.com</a>
<b>CAPGEMINI (HANGZHOU) Co., LTD</b> 330100400004425	15F, Building E,Tiantang Software Park, 3 XiDouMen Road, 310012 Hangzhou, Zhe Jiang Province, China <a href="mailto:dpo.cn@capgemini.com">dpo.cn@capgemini.com</a>
<b>CAPGEMINI (KUNSHAN) CO., LTD.</b> 320583400050999	NO.1 Jinjie Road, service outsourcing area Huaqiao, Kunshan, Jiangsu Province, China <a href="mailto:dpo.cn@capgemini.com">dpo.cn@capgemini.com</a>

<b>Altran (Xi'an) Technologies, Company Limited</b> 91610131MA6UQKMU7U	5th FL, A11 Building, No.156 Tian Gu 8 Road, Software New Town of Hi-tech Development Zone. Xi'an China <a href="mailto:dpo.cn@capgemini.com">dpo.cn@capgemini.com</a>
<b>Altran (Beijing) Technologies, Company Limited</b> 91110108078535347A	Room 132008, 17th FL, Building C, Tower 1 of Wangjing SOHO, No. 1 Futong East Road, Chaoyang District 100020 Beijing, China <a href="mailto:dpo.cn@capgemini.com">dpo.cn@capgemini.com</a>
<b>Altran (Shanghai) Information &amp; Technologies, Company Limited</b> 913101153125083000	The 3rd floor, Building 1, No. 400 Fangchun Road, Pilot Free Trade Zone 201203 Shanghai, China <a href="mailto:dpo.cn@capgemini.com">dpo.cn@capgemini.com</a>
<b>Altran Shanghai, Limited</b> 91310000695752806Q	Room B33, the 7th floor, No. 1359 Zhonghua Road, Huangpu district 200001 Shanghai, China <a href="mailto:dpo.cn@capgemini.com">dpo.cn@capgemini.com</a>
<b>Frog Business Consultancy (Shanghai), Company Limited</b> 91310000666008500P	373-381 South Suzhou Road, Room 407P01, Huangpu, 200040 Shanghai, China <a href="mailto:dpo.cn@capgemini.com">dpo.cn@capgemini.com</a>
<b>Sicon Design Technologies (Shanghai), Company Limited</b> 9131011509422053X2	700 Shangfeng Road, Unit 8, Room 301A, Pudong, 200120 Shanghai, China <a href="mailto:dpo.cn@capgemini.com">dpo.cn@capgemini.com</a>
<b>Capgemini Hong Kong Ltd</b> 536651	Suites 4101-02 & 4111-12, 41/F., One Island East, Taikoo Place, 18 Westlands Road, Quarry Bay, Hong Kong <a href="mailto:privacy.apac@capgemini.com">privacy.apac@capgemini.com</a>
<b>ITBCONSULT HONGKONG LIMITED</b> 63804140	Room 1905, 19/F., West Tower, Shun Tak Centre, 168-200 Connaught Road Central, Hong Kong <a href="mailto:privacy.apac@capgemini.com">privacy.apac@capgemini.com</a>
<b>Altran China Limited</b> 876293	Suites 1202-04, Tower 2, The Gateway, 25 Canton Road, TST, Kowloon, Hong Kong China <a href="mailto:privacy.apac@capgemini.com">privacy.apac@capgemini.com</a>
<b>Capgemini Vietnam Co. Ltd</b> 411043001695	Centre Point Building, 106 Nguyen Van Troi, Ward 8, Phu Nhuan District, Ho Chi Minh City, Vietnam <a href="mailto:privacy.apac@capgemini.com">privacy.apac@capgemini.com</a>

<b>Capgemini Saudi Ltd</b> 1024341133776	Centria Mall Office Tower, Suite 506, 5th floor, Prince Muhammad ibn Abdulaziz Road / Olaya Street, Al Olaya District, 12241-6055 Riyadh Kingdom of Saudi Arabia <a href="mailto:dpo.sa@capgemini.com">dpo.sa@capgemini.com</a>
<b>Altran Middle East Private Plc</b> 1010430493	Al Oyal, Kingdom Tower, 25 <sup>th</sup> floor, 11351 Riyadh, Saudi Arabia <a href="mailto:privacy.apac@capgemini.com">privacy.apac@capgemini.com</a>
<b>Altran Middle East FZ-LLC</b> 502709	1803-1804 Al Thuraya Tower 1, PO Box 502709 Dubai Media City, United Arab Emirates <a href="mailto:privacy.apac@capgemini.com">privacy.apac@capgemini.com</a>
<b>Altran Israel Limited</b> 514792282	7 Rival Street, 6777840, Tel-Aviv Yafo, Israël <a href="mailto:privacy.apac@capgemini.com">privacy.apac@capgemini.com</a>
<b>Capgemini Japan K.K</b> 0104-02-035069	Level 23, Otemachi Financial City North Tower, 1-9-5 Otemachi, Chiyoda-ku, 100-0004 Tokyo, Japan <a href="mailto:dpo.jp@capgemini.com">dpo.jp@capgemini.com</a>
<b>Altran Engineering Solutions Japan Limited</b> 0104-01-126631	2-15-1 Kounan 28F Shinagawa Intercity Tower A, Minato-ku 108-6028 Tokyo, Japan <a href="mailto:dpo.jp@capgemini.com">dpo.jp@capgemini.com</a>
<b>Altran Japan Limited</b> 0104-01-080476	1-23-1 Toranomom, Toranomom Hills Mori Tower, 22 <sup>nd</sup> Floor, Minato-ku 105-6322 Tokyo, Japan <a href="mailto:dpo.jp@capgemini.com">dpo.jp@capgemini.com</a>
<b>Cambridge Consultants Japan Inc.</b> 9-0104-01-126095	3-1-3 Minamiaoyama, 6F Spline Aoyama Tokyu Building, Minato-ku, 107-0062 Tokyo, Japan <a href="mailto:dpo.jp@capgemini.com">dpo.jp@capgemini.com</a>
<b>Capgemini Philippines Corp</b> CS200714668	12th Floor, 10 West Campus, McKinley West, Fort Bonifacio, Taguig City, Philippines <a href="mailto:privacy.apac@capgemini.com">privacy.apac@capgemini.com</a>
<b>Whitesky Labs (Philippines) Inc.</b> CS201410583	3304 Robinsons Equitable Building, 4 ADB Avenue, Ortigas, Manila, Philippines <a href="mailto:privacy.apac@capgemini.com">privacy.apac@capgemini.com</a>
<b>Whitesky Labs (Philippines) N° 2 Inc.</b> CS201913590	3304 Robinsons Equitable Building, 4 ADB Avenue, Ortigas, Manila, Philippines <a href="mailto:privacy.apac@capgemini.com">privacy.apac@capgemini.com</a>
<b>Multibook Asia Pacific Inc.</b> CS201405679	7 <sup>th</sup> floor, Tower 2 Insular Life Corporate Centre, Insular Life Drive, Filinvest Corporate City, Alabang, 1781 Muntinlupa City, Philippines <a href="mailto:privacy.apac@capgemini.com">privacy.apac@capgemini.com</a>
<b>Capgemini Services Malaysia SDN BHD</b> 201101031070	Suite 15-01, G Tower, 199 Jalan Tun Razak, 50400 Kuala Lumpur, Malaysia <a href="mailto:privacy.apac@capgemini.com">privacy.apac@capgemini.com</a>

<b>Aricent Technologies Malaysia SDN BHD</b> 201801002823	Jalan Raja Chulan, Plaza See Hoy Chan, Suite 6.01, 6 <sup>th</sup> floor, 50200 Kuala Lumpur, Malaysia <a href="mailto:privacy.apac@capgemini.com">privacy.apac@capgemini.com</a>
<b>Capgemini Technology Services India Limited</b> U85110PN1993PLC145950	No. 14, Rajiv Gandhi Infotech Park, Hinjewadi Phase-III, MIDC-SEZ, Village Man, Taluka Mulshi, Pune 411057, Maharashtra – India <a href="mailto:dpo.in@capgemini.com">dpo.in@capgemini.com</a>
<b>Capgemini IT Solutions India Private Limited</b> U74995MH2018FTC330429	5th Floor Part A, Block IV, Plot IT-3 IT-4, Airoli Knowledge Park, TTC Industrial Area, MIDC, Airoli, 400708 Navi Mumbai, Maharashtra, India <a href="mailto:dpo.in@capgemini.com">dpo.in@capgemini.com</a>
<b>Leading Purpose Campaigns (India) Private Limited</b> U74999DL2018FTC329926	1 <sup>st</sup> Floor, D3 Soami Nagar, New Delhi, DI 110017, India <a href="mailto:dpo.in@capgemini.com">dpo.in@capgemini.com</a>
<b>Aricent Technologies (Holdings) Limited</b> U72100DL2006PLC149728	5 Jain mandir marg (Annexe), Cannaught Place, 110001 DELHI, India <a href="mailto:dpo.in@capgemini.com">dpo.in@capgemini.com</a>
<b>Altran Technologies India Private Limited</b> U74140KA1996ULT068492	SEZ Bellandur Village – RMZ Ecospace, Block 9B Pritech Park, 2 <sup>nd</sup> floor Varthur Hobli, 560103 Bangalore, India <a href="mailto:dpo.in@capgemini.com">dpo.in@capgemini.com</a>
<b>Global Edge Software Limited</b> U85110KA1992PLC013114	Mysore Road, Global Village – RVCE Post 560059 Bangalore, India <a href="mailto:dpo.in@capgemini.com">dpo.in@capgemini.com</a>
<b>Pan Asia Solutions</b> 98-0688854	Suite 206, SIT Business Center, NG Tower, Cyber City Ebene, Mauritius <a href="mailto:privacy.apac@capgemini.com">privacy.apac@capgemini.com</a>
<b>Capgemini Services (Thailand) Co. LTD</b>	8 Wework, T-One Building, 20th Floor, Soi Sukhumvit 40, Sukhumvit Road, Khlong Toei District, Phra Khanong Sub-District, Bangkok, THAILAND <a href="mailto:privacy.apac@capgemini.com">privacy.apac@capgemini.com</a>

North America	
<b>Capgemini North America, Inc.</b> 3509818	c/o Corporation Service Company, 251 Little Falls Drive, 19808 Wilmington, Delaware, USA <a href="mailto:dataprivacyoffice.nar@capgemini.com">dataprivacyoffice.nar@capgemini.com</a>
<b>Capgemini America, Inc</b> 0100245598	c/o Corporation Service Company Priceton South Corporate Ctr., Ste. 160, 100 Charles Ewing Blvd.08628 Ewing, New Jersey, USA <a href="mailto:dataprivacyoffice.nar@capgemini.com">dataprivacyoffice.nar@capgemini.com</a>
<b>Capgemini Business Services USA LLC</b> 5010627	c/o Corporation Services Company, 251 Little Falls Drive 19808 Wilmington, Delaware, USA <a href="mailto:dataprivacyoffice.nar@capgemini.com">dataprivacyoffice.nar@capgemini.com</a>
<b>Capgemini Technologies LLC</b> 3529062	c/o Corporation Services Company, 251 Little Falls Drive 19808 Wilmington, Delaware, USA <a href="mailto:dataprivacyoffice.nar@capgemini.com">dataprivacyoffice.nar@capgemini.com</a>
<b>Capgemini Government Solutions LLC</b> 3584244	c/o Corporation Services Company, 251 Little Falls Drive 19808 Wilmington, Delaware, USA <a href="mailto:dataprivacyoffice.nar@capgemini.com">dataprivacyoffice.nar@capgemini.com</a>
<b>Restaurant Application Development International LLC</b> 4805345	c/o Corporation Services Company, 251 Little Falls Drive 19808 Wilmington, Delaware, USA <a href="mailto:dataprivacyoffice.nar@capgemini.com">dataprivacyoffice.nar@capgemini.com</a>
<b>Annik Inc</b> P07000081250	1201 Hays Street, 32301 Tallahassee, County of Leon, Florida 33771, USA <a href="mailto:dataprivacyoffice.nar@capgemini.com">dataprivacyoffice.nar@capgemini.com</a>
<b>Purpose Global PBC</b> 5045539	c/o Corporation Services Company, 251 Little Falls Drive 19808 Wilmington, Delaware, USA <a href="mailto:dataprivacyoffice.nar@capgemini.com">dataprivacyoffice.nar@capgemini.com</a>
<b>Purpose Campaigns LLC</b> 3971119	c/o Corporation Services Company, 251 Little Falls Drive 19808 Wilmington, Delaware, USA <a href="mailto:dataprivacyoffice.nar@capgemini.com">dataprivacyoffice.nar@capgemini.com</a>
<b>Variq Corporation</b>	Corporation service company, 112 North Curry Street, Carson City, NV 89703, USA <a href="mailto:dataprivacyoffice.nar@capgemini.com">dataprivacyoffice.nar@capgemini.com</a>
<b>Altran Engineering Solution Inc.</b> 800653319	40600 Ann Arbor Road E, Suite 201, MI 48170-4675 Plymouth, USA <a href="mailto:dataprivacyoffice.nar@capgemini.com">dataprivacyoffice.nar@capgemini.com</a>
<b>Cambridge Consultants Inc.</b> 867390	745 Atlantic Avenue #6, MA 02111 Boston, USA <a href="mailto:dataprivacyoffice.nar@capgemini.com">dataprivacyoffice.nar@capgemini.com</a>
<b>Capgemini Canada Inc</b> 610099	44 Chipman Hill, 10th Floor, Station "A", Saint John NB E2L 4S6, Canada <a href="mailto:dataprivacyoffice.nar@capgemini.com">dataprivacyoffice.nar@capgemini.com</a>

<p><b>Capgemini Solutions Canada, Inc</b> 860883149NP002</p>	<p>44 Chipman Hill, Suite 1000, Saint John NB E2L 2A9, Canada <a href="mailto:dataprivacyoffice.nar@capgemini.com">dataprivacyoffice.nar@capgemini.com</a></p>
<p><b>Inergi LP</b> N/A.</p>	<p>200 University Avenue, Suite 1100 – Toronto, ON, Canada M5H 3C6 <a href="mailto:dataprivacyoffice.nar@capgemini.com">dataprivacyoffice.nar@capgemini.com</a></p>
<p><b>Inergi Inc.</b> 515460</p>	<p>44 Chipman Hill, Suite 1000, Saint John NB E2L 2A9, Canada <a href="mailto:dataprivacyoffice.nar@capgemini.com">dataprivacyoffice.nar@capgemini.com</a></p>
<p><b>New Horizon System Solutions LP</b> N/A.</p>	<p>700 University Avenue, Suite 1100, Toronto, ON, Canada M5G 1X6 <a href="mailto:dataprivacyoffice.nar@capgemini.com">dataprivacyoffice.nar@capgemini.com</a></p>
<p><b>New Horizon System Solutions Inc.</b> 1459267</p>	<p>700 University Avenue, Suite 1100, Toronto, ON, Canada M5G 1X6 <a href="mailto:dataprivacyoffice.nar@capgemini.com">dataprivacyoffice.nar@capgemini.com</a></p>
<p><b>Société en Commandite Capgemini Québec – Capgemini Québec Limited Partnership (LP)</b> NEZ 3367034736</p>	<p>1100 boul. René-Lévesque Ouest, Suite 1110 - Montreal, Québec, Canada H3B 4N4 <a href="mailto:dataprivacyoffice.nar@capgemini.com">dataprivacyoffice.nar@capgemini.com</a></p>
<p><b>Gestion Capgemini Quebec Inc.</b> 1167041293</p>	<p>C/O WW Place Ville Marie LP, 3 place Ville Marie, Suite 400, QC H3B 2E3 Montreal, Canada <a href="mailto:dataprivacyoffice.nar@capgemini.com">dataprivacyoffice.nar@capgemini.com</a></p>
<p><b>Microsys Technologies Inc.</b> 001909086</p>	<p>3710 Nashua Drive, Unit 1, L4V 1M5 Mississauga, Canada <a href="mailto:dataprivacyoffice.nar@capgemini.com">dataprivacyoffice.nar@capgemini.com</a></p>



LATAM	
<b>Capgemini Argentina SA</b> 1.613.291	Avenida Presidente Roque Sáenz Peña 615, Piso 2º, Edificio Bencich, C1035AAB, Buenos Aires, Argentina <a href="mailto:protecciondatospersonales.ar@capgemini.com">protecciondatospersonales.ar@capgemini.com</a>
<b>Capgemini Business Services Brasil – Assessoria Empresarial Ltda</b> 09.165.392/0001-13	Avenida John Dalton, 301, Lote 2, Block C, Edifício 4, CEP 13069-330, Campinas, São Paulo, Brazil <a href="mailto:dpobrasil.br@capgemini.com">dpobrasil.br@capgemini.com</a>
<b>Capgemini Brasil S.A.</b> 65.599.953\0001-63	Alameda Araguaia, nº 1.930, Alphaville, Cidade de Barueri, State of São Paulo, Zip Code 06455-000, Brazil <a href="mailto:dpobrasil.br@capgemini.com">dpobrasil.br@capgemini.com</a>
<b>RADI Software do Brasil Ltda</b> 11.855.485/0001-11	Rua Alexandre Dumas, No. 1711, 1 <sup>st</sup> floor, unit 101, Chácara Santo Antônio, Zip Code 04717-004, City of São Paulo, State of São Paulo, Brazil <a href="mailto:dpobrasil.br@capgemini.com">dpobrasil.br@capgemini.com</a>
<b>Purpose Campaigns Brazil Ltda</b> 35231013042	Rua Cubatao 472 Sala 07 Vila Mariana Sao Paulo, SP 04013-001, Brazil <a href="mailto:dpobrasil.br@capgemini.com">dpobrasil.br@capgemini.com</a>
<b>Capgemini Colombia SAS</b> 2197990	Avenida Chile, Carrera 7 No. 71-72 Torre B, oficina 1541. Bogotá DC, Colombia <a href="mailto:dpo.mx@capgemini.com">dpo.mx@capgemini.com</a>
<b>Capgemini Costa Rica SRL</b>	San José, Escazú, Guachipelín, 400 meters north of Construplaza, Edificio Latitud Norte, 3rd floor, Quatro Legal Office <a href="mailto:dpo.mx@capgemini.com">dpo.mx@capgemini.com</a>
<b>Capgemini Business Services Guatemala SA</b> No.77886 Folio 548 Book 171 of Companies	15 Avenida 5-00 Zona 13, Edificio World Technology Center Torre Sur Nivel 11, Ciudad de Guatemala, Guatemala <a href="mailto:privacy.gt@capgemini.com">privacy.gt@capgemini.com</a>
<b>Capgemini Mexico, S. de R.L. de C.V</b> 219759	Av. Santa Fe 440, Piso 8, Colonia Cuajimalpa Morelos, Delegacion Cuajimalpa, 05348 Mexico, D.F., Mexico <a href="mailto:dpo.mx@capgemini.com">dpo.mx@capgemini.com</a>



## Appendix 2 – Capgemini Processing activities

The table copied below describes the data Transfers covered by the BCR where Capgemini is acting as a Data Processor. The list below is intended to be as complete as possible but shall not be construed as being exhaustive. Capgemini delivers a very wide array of services to its clients; therefore, the list below is subject to changes.

In practice, Capgemini suggests delivery models to clients depending on the nature of the services to be delivered. Clients are ultimately responsible to determine which delivery model is to be implemented including if and where data shall be transferred.

In addition, below is the list of our global delivery centers – these are the most common locations from which services are delivered to clients:

- India
- Poland
- Morocco
- Mexico
- Romania
- Egypt
- Philippines
- Vietnam



<b>Purposes / Type of service(s) delivered</b>	<b>Categories of data</b>	<b>Data Subjects</b>	<b>Countries where data is transferred</b>
<p style="color: red; text-align: center;"><b>Please find below the most common types of Personal Data shared with, accessed by or otherwise processed by Capgemini where delivering services to Clients. Clients determine which information – including Personal Data – may be shared with, accessed by or otherwise processed by Capgemini.</b></p> <p style="color: red; text-align: center;"><b>For each type of services, Capgemini would suggest a delivery model to the Client – including in particular the location(s) from where data shall be accessed and further processed. The Client would then decide which delivery model to implement based on multiple criteria including for instance compliance and pricing.</b></p>			
<p><b>Custom software development</b></p>	<p>Although the delivery of these types of services may not systematically involve the processing of Personal Data, Capgemini may access or otherwise process Personal Data in the course of delivering these services where specifically instructed by the Client. Such data would most likely include:</p> <ul style="list-style-type: none"> <li>▪ <b>Contact details</b>, such as name, address, telephone numbers, email address;</li> <li>▪ <b>Details of IT and connection data</b></li> </ul>	<p>Depending on the nature and purpose(s) of the software to be developed:</p> <ul style="list-style-type: none"> <li>▪ Client’s employees</li> <li>▪ Client’s partners</li> <li>▪ Client’s candidates</li> <li>▪ Client’s business partners</li> <li>▪ Client’s service providers</li> <li>▪ Client’s customers</li> <li>▪ Client’s prospects</li> </ul>	<p>India Philippines Vietnam Mexico</p>



<p><b>Implementation of an Enterprise Resource Planning (ERP) software</b> including:</p> <ul style="list-style-type: none"> <li>▪ Financial information</li> <li>▪ Accounting information</li> <li>▪ Human Resources</li> <li>▪ Customer Relationship Management (CRM)</li> </ul>	<p>Depending on the type of ERP to be implemented:</p> <ul style="list-style-type: none"> <li>▪ <b>Contact details</b>, such as name, address, telephone numbers, email address, number of children, citizenship, ID details, visa details, work permit details, emergency contact details, dependents details, marital status, life insurance beneficiaries, pictures or images;</li> <li>▪ <b>Financial information</b> relating to compensation, benefits and pension arrangements, such as details of salary, bank account, tax codes, travel expenses, stock options, stock purchase plan;</li> <li>▪ <b>Recruitment information</b>, such as CV, application form, notes of interviews, applicant references (if recorded), qualifications, test results (if applicable);</li> <li>▪ <b>Employment administration information</b>, such as employment and career history, grades, managers, employment contract details, absence records, safety</li> </ul>	<p>Depending on the type of ERP to be implemented:</p> <ul style="list-style-type: none"> <li>▪ Client’s employees</li> <li>▪ Client’s candidates</li> <li>▪ Client’s business partners</li> <li>▪ Client’s service providers</li> <li>▪ Client’s customers</li> <li>▪ Client’s prospects</li> </ul>	<p>India Philippines Vietnam Mexico</p>



	<p>records, health and sickness records, accident reports, personal development reviews, driving license details and associated documents, skills records, government issued identification numbers;</p> <ul style="list-style-type: none"> <li>▪ <b>Professional experience information</b>, such as professional resume, qualifications, details of projects Employees have worked on, training records, mobility records;</li> </ul>		
<p><b>Maintenance &amp; Monitoring of existing applications (helpdesk services)</b></p>	<p>Depending on the type of application(s) to be maintained / monitored:</p> <ul style="list-style-type: none"> <li>▪ <b>Details of IT and connection data</b> to the Client’s IT systems being monitored &amp; maintained.</li> <li>▪ <b>Information included in incident tickets</b></li> </ul>	<p>Depending on the type of application(s) to be maintained / monitored:</p> <ul style="list-style-type: none"> <li>▪ Client’s employees</li> <li>▪ Client’s candidates</li> <li>▪ Client’s business partners</li> <li>▪ Client’s service providers</li> <li>▪ Client’s customers</li> </ul>	<p>India Philippines Vietnam Mexico</p>
<p><b>Testing Services</b></p>	<p>As a principle, the delivery of these types of services should not involve the processing of real personal data. However, under special circumstances and subject to clients’ instructions, Capgemini may process some personal data.</p>	<p>Depending on the nature of the system(s) to be tested:</p> <ul style="list-style-type: none"> <li>▪ Client’s employees</li> <li>▪ Client’s candidates</li> <li>▪ Client’s business partners</li> </ul>	<p>India Philippines Vietnam Mexico</p>



	<p>Depending on the nature of the system(s) to be tested:</p> <ul style="list-style-type: none"> <li>▪ <b>Details of IT and connection data</b> to the Client’s IT systems being monitored &amp; maintained.</li> <li>▪ <b>Contact details</b>, such as name, address, telephone numbers, email address;</li> <li>▪ <b>Information included in incident tickets</b></li> </ul>	<ul style="list-style-type: none"> <li>▪ Client’s service providers</li> <li>▪ Client’s customers</li> <li>▪ Client’s prospects</li> </ul>	
<p><b>Digital Customer Experience</b></p> <ul style="list-style-type: none"> <li>▪ Design &amp; development of front-end applications, mobile solutions</li> <li>▪ Application development &amp; platforms that relates to</li> </ul>	<p>Although the delivery of these types of services may not systematically involve the processing of Personal Data, Capgemini may access or otherwise process Personal Data in the course of delivering these services where specifically instructed by the Client.</p> <p>Such data would most likely include:</p> <ul style="list-style-type: none"> <li>▪ <b>Details of IT and connection data</b> to the Client’s IT systems being monitored &amp; maintained.</li> <li>▪ <b>Contact details</b>, such as name, address, telephone numbers, email address;</li> </ul>	<p>Depending on the nature of the system(s)/application(s) to be designed and/or developed:</p> <ul style="list-style-type: none"> <li>▪ Client’s employees</li> <li>▪ Client’s candidates</li> <li>▪ Client’s business partners</li> <li>▪ Client’s service providers</li> <li>▪ Client’s customers</li> <li>▪ Client’s prospects</li> </ul>	<p>India Philippines Vietnam Mexico</p>



	<ul style="list-style-type: none"> <li>▪ <b>Information included in incident tickets i.e. support &amp; maintenance data</b></li> </ul>		
<p><b>Digital Engineering &amp; Manufacturing Services</b></p> <ul style="list-style-type: none"> <li>▪ Embedded Software Development</li> <li>▪ Hardware Design</li> </ul>	<p>As a principle, the delivery of these types of services should not involve the processing of real personal data. However, under special circumstances and subject to clients’ instructions, Capgemini may process some personal data.</p> <p>Such data would most likely include:</p> <ul style="list-style-type: none"> <li>▪ <b>Details of IT and connection data</b> to the Client’s IT systems being monitored &amp; maintained.</li> <li>▪ <b>Contact details</b>, such as name, address, telephone numbers, email address;</li> <li>▪ <b>Information included in incident tickets i.e. support &amp; maintenance data</b></li> </ul>	<p>Depending on the nature of the software(s) / hardware(s) to be designed and/or developed:</p> <ul style="list-style-type: none"> <li>▪ Client’s employees</li> <li>▪ Client’s candidates</li> <li>▪ Client’s business partners</li> <li>▪ Client’s service providers</li> <li>▪ Client’s customers</li> <li>▪ Client’s prospects</li> </ul>	<p>India Philippines Vietnam Mexico</p>
<p><b>Infrastructure setup &amp; maintenance services:</b></p>	<p>Processing of Personal Data while delivering these types of services would be limited.</p>	<p>Depending on the application(s) network(s) and/or server(s) to be</p>	<p>India Philippines Vietnam</p>



<ul style="list-style-type: none"> <li>▪ Application hosting &amp; run</li> <li>▪ Data storage &amp; backup</li> <li>▪ Network monitoring &amp; operations</li> <li>▪ Server management</li> </ul>	<p>Depending on the types of application(s), network and/or servers to host/manage such data would likely include:</p> <ul style="list-style-type: none"> <li>▪ <b>Details of IT and connection data</b> to the Client’s IT systems being monitored &amp; maintained.</li> <li>▪ <b>Contact details</b>, such as name, address, telephone numbers, email address;</li> <li>▪ <b>Information included in incident tickets i.e. support &amp; maintenance data</b></li> </ul>	<p>hosted, run, monitored or backed-up:</p> <ul style="list-style-type: none"> <li>▪ Client’s employees</li> <li>▪ Client’s candidates</li> <li>▪ Client’s business partners</li> <li>▪ Client’s service providers</li> <li>▪ Client’s customers</li> <li>▪ Client’s prospects</li> </ul>	<p>Mexico</p>
<p><b>Cybersecurity projects &amp; services:</b></p> <ul style="list-style-type: none"> <li>▪ Consulting</li> <li>▪ Audit &amp; monitoring services to protect against cyberattacks &amp; internal malicious behavior</li> </ul>	<p>Although the delivery of these types of services may not systematically involve the processing of Personal Data, Capgemini may access or otherwise process Personal Data in the course of delivering these services where specifically instructed by the Client.</p> <p>Such data would most likely include:</p> <ul style="list-style-type: none"> <li>▪ <b>Details of IT and connection data</b> to the Client’s IT systems being monitored &amp; maintained.</li> <li>▪ <b>Contact details</b>, such as name, address, telephone numbers, email address;</li> </ul>	<p>Depending on the application(s) network(s) and/or server(s) to be monitored and/or audited:</p> <ul style="list-style-type: none"> <li>▪ Client’s employees</li> <li>▪ Client’s candidates</li> <li>▪ Client’s business partners</li> <li>▪ Client’s service providers</li> <li>▪ Client’s customers</li> <li>▪ Client’s prospects</li> </ul>	<p>India Philippines Vietnam Mexico</p>





<p><b>Remote infrastructure management</b></p>	<p>Depending on the nature of the infrastructure to manage:</p> <ul style="list-style-type: none"> <li>▪ <b>Contact details</b>, such as name, address, telephone numbers, email address, number of children, citizenship, ID details, visa details, work permit details, emergency contact details, dependents details, marital status, life insurance beneficiaries, pictures or images;</li> <li>▪ <b>Financial information</b> relating to compensation, benefits and pension arrangements, such as details of salary, bank account, tax codes, travel expenses, stock options, stock purchase plan;</li> <li>▪ <b>Recruitment information</b>, such as CV, application form, notes of interviews, applicant references (if recorded), qualifications, test results (if applicable);</li> <li>▪ <b>Employment administration information</b>, such as employment and career history, grades, managers, employment contract details, absence records, safety records, health and sickness records, accident reports, personal development reviews, driving license details and associated documents,</li> </ul>	<p>Depending on the infrastructure to be managed:</p> <ul style="list-style-type: none"> <li>▪ Client’s employees</li> <li>▪ Client’s candidates</li> <li>▪ Client’s business partners</li> <li>▪ Client’s service providers</li> <li>▪ Client’s customers</li> <li>▪ Client’s prospects</li> </ul>	<p>India Philippines Vietnam Mexico</p>



	<p>skills records, government issued identification numbers;</p> <ul style="list-style-type: none"> <li>▪ <b>Professional experience information</b>, such as professional resume, qualifications, details of projects Employees have worked on, training records, mobility records;</li> <li>▪ <b>Details of IT and connection data</b> to the Client’s IT systems being monitored &amp; maintained.</li> </ul>		
<b>Cloud architecture setup</b>	<p>As a principle, the delivery of these types of services should not involve the processing of real personal data. However, under special circumstances and subject to clients’ instructions, Capgemini may process some personal data.</p> <p>Such data would most likely include:</p> <ul style="list-style-type: none"> <li>▪ <b>Details of IT and connection data</b> to the Client’s IT systems being monitored &amp; maintained.</li> <li>▪ <b>Contact details</b>, such as name, address, telephone numbers, email address;</li> </ul>	<p>Depending on the nature and purpose(s) of the cloud to be set-up:</p> <ul style="list-style-type: none"> <li>▪ Client’s employees</li> <li>▪ Client’s candidates</li> <li>▪ Client’s business partners</li> <li>▪ Client’s service providers</li> <li>▪ Client’s customers</li> <li>▪ Client’s prospects</li> </ul>	<p>India Philippines Vietnam Mexico</p>
<b>Managing business process &amp; executing</b>	<p>Depending on the type of ERP to be implemented:</p>	<p>Depending on the nature and purpose(s) of the cloud to be set-up :</p>	<p>India Philippines</p>



<p><b>business operations of clients' organizations</b></p> <ul style="list-style-type: none"> <li>- Finance &amp; Accounting inc. invoice processing, payment processing accounts receivables &amp; related services, complete end-to-end service (from posting an invoice to making payment to a supplier and providing management and statutory information for reporting).</li> <li>- HR: recruitment, rewards &amp; recognition, employee data management, reconciliations &amp; disbursements, payroll, incentive programs, taxation, time &amp;</li> </ul>	<ul style="list-style-type: none"> <li>▪ <b>Contact details</b>, such as name, address, telephone numbers, email address, number of children, citizenship, ID details, visa details, work permit details, emergency contact details, dependents details, marital status, life insurance beneficiaries, pictures or images;</li> <li>▪ <b>Financial information</b> relating to compensation, benefits and pension arrangements, such as details of salary, bank account, tax codes, travel expenses, stock options, stock purchase plan;</li> <li>▪ <b>Recruitment information</b>, such as CV, application form, notes of interviews, applicant references (if recorded), qualifications, test results (if applicable);</li> <li>▪ <b>Employment administration information</b>, such as employment and career history, grades, managers, employment contract details, absence records, safety records, health and sickness records, accident reports, personal development reviews, driving license details and associated documents, skills records, government issued identification numbers;</li> <li>▪ <b>Professional experience information</b>, such as professional resume, qualifications, details of</li> </ul>	<ul style="list-style-type: none"> <li>▪ Client's employees</li> <li>▪ Client's candidates</li> <li>▪ Client's business partners</li> <li>▪ Client's service providers</li> <li>▪ Client's customers</li> <li>▪ Client's prospects</li> </ul>	<p>Vietnam Mexico</p>
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<p>attendance, expenses</p> <ul style="list-style-type: none"> <li>- Knowledge Process Outsourcing: specialized processes in financial services &amp; manufacturing and research &amp; analytics</li> <li>- Procurement: supporting clients' procurement needs, administrating the suppliers base and data to sourcing services, identifying suppliers &amp; negotiating terms &amp; contracts with them</li> <li>- Management assurance Services:</li> </ul>	<p>projects Employees have worked on, training records, mobility records;</p> <ul style="list-style-type: none"> <li>▪ <b>Details of IT and connection data</b> to the Client's IT systems being monitored &amp; maintained.</li> </ul>		
<p><b>AI &amp; Data Engineering</b></p> <p>Analytics &amp; Data Science:</p> <ul style="list-style-type: none"> <li>- Test, build &amp; run projects</li> </ul>	<p>As a principle, the delivery of these types of services should not involve the processing of real personal data. However, under special circumstances and subject to clients' instructions,</p>	<p>Depending on the nature and purpose(s) of the cloud to be set-up :</p> <ul style="list-style-type: none"> <li>▪ Client's employees</li> <li>▪ Client's candidates</li> </ul>	<p>India Philippines Vietnam</p>

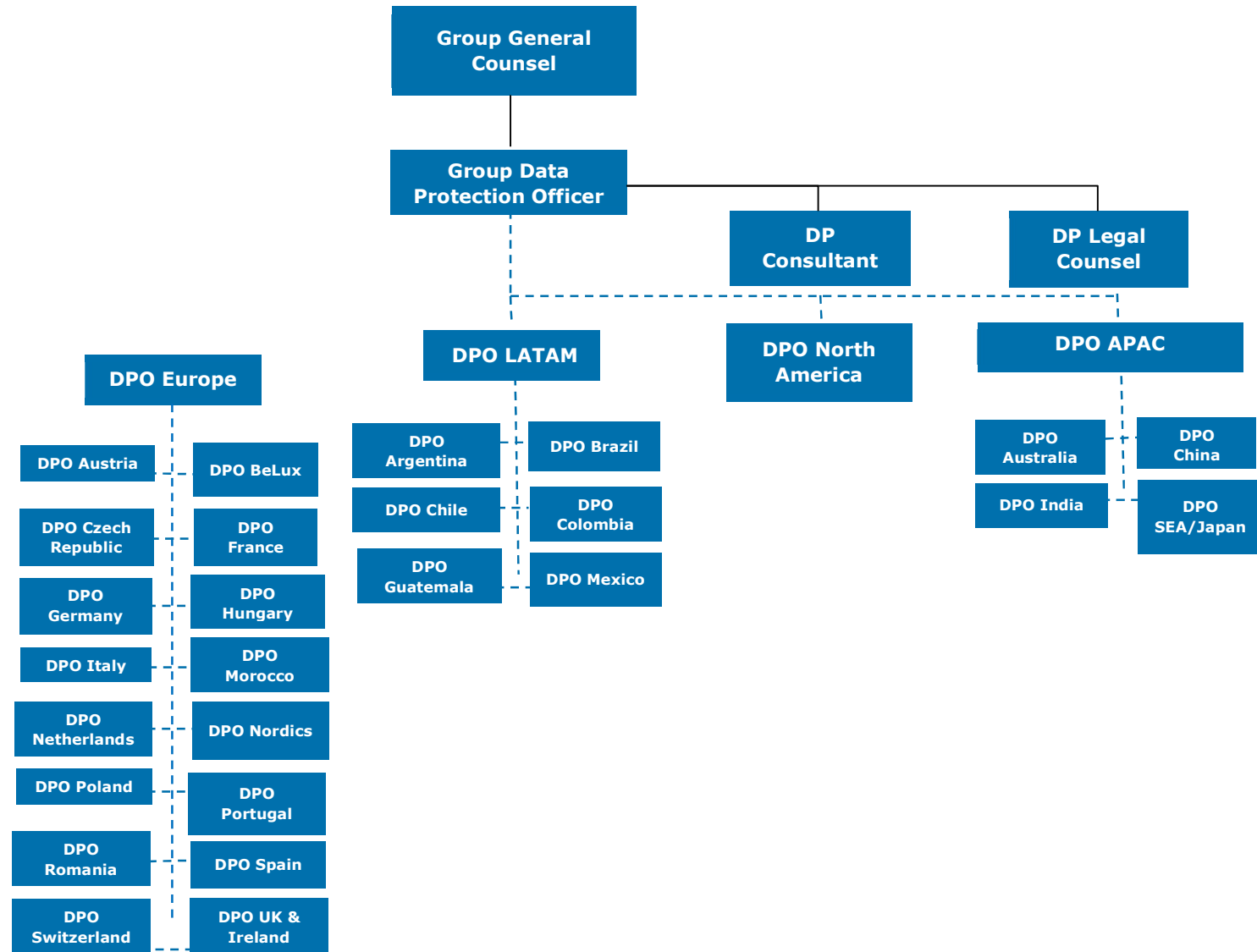


<ul style="list-style-type: none"> <li>- Business intelligence: leveraging software &amp; services to transform data into actionable insights that inform an organization’s strategic and tactical business decisions</li> </ul>	<p>Capgemini may process some personal data.</p> <p>Such data would most likely include:</p> <ul style="list-style-type: none"> <li>▪ <b>Details of IT and connection data</b> to the Client’s IT systems being monitored &amp; maintained.</li> <li>▪ <b>Contact details</b>, such as name, address, telephone numbers, email address;</li> </ul>	<ul style="list-style-type: none"> <li>▪ Client’s business partners</li> <li>▪ Client’s service providers</li> <li>▪ Client’s customers</li> <li>▪ Client’s prospects</li> </ul>	<p>Mexico</p>
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# Appendix 3 – Capgemini Data Protection Organisation

## Data Protection Champions GBLs / Sales / Delivery / FS / Group Functions





## Appendix 4 – Data Subjects Requests Handling Procedure

*This procedure shall be published on all Capgemini websites and adapted to include any relevant local legal requirement.*

*The aim of this document is to explain to individuals whose Personal Data are processed by Capgemini ("Data Subjects") how to exercise their rights.*

As we care about your privacy, we want you to be aware of how and why we may collect and further process your Personal Data, and in particular, what are your rights and how to exercise them.



### Key data protection notions

"**Personal data**" does not only refer to information related to your private life but encompasses any and all information which enables to identify you either directly or indirectly.

"**Processing**" means any operation which is performed on Personal Data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure, combination, restriction, erasure or destruction.

"**Controller**" means the natural or legal person which determines the purposes and means of the processing of Personal Data.

"**Processor**" means the natural or legal person which processes Personal Data on behalf of the controller.

"**Purpose**" means the reason(s) why the controller needs to collect and further process the Personal Data.

Capgemini Service SAS and/or affiliates of Capgemini SE (together referred to as "**Capgemini**") collect(s) and further process(es) your Personal Data as a Controller or as a Processor on behalf of a Controller. In any case, you can contact Capgemini – following the procedure described hereunder – to exercise your data protection rights.



## What are your rights?

As a Data Subject, you can request to exercise the following rights in relation to the Personal Data concerning you that Capgemini collects and further processes:



<b>Access your Personal Data</b>	You can ask Capgemini confirmation as to whether or not Personal Data concerning you are being processed, and where that is the case, you can request access to your Personal Data.
<b>Request the deletion of your Personal Data</b>	In some cases, you can request that Capgemini delete your Personal Data.
<b>Request the rectification of your Personal Data</b>	You can ask Capgemini to rectify inaccurate Personal Data concerning you. This means that you can also request that Capgemini updates or completes your Personal Data.
<b>Object to the processing of your Personal Data</b>	In some cases, you are entitled to ask Capgemini not to process your personal data.
<b>Request the restriction of the processing of your Personal Data</b>	In some cases, you can ask Capgemini to limit the processing of your Personal Data for some purposes and subject to certain conditions.
<b>Withdraw your consent to the processing of your Personal Data</b>	You can withdraw your consent to the processing of your Personal Data even if you had initially granted such consent for Capgemini to process the Personal Data.
<b>Right to data portability</b>	In some cases, you can ask Capgemini to provide you with your Personal Data in a structured, commonly used and machine-readable format; and/or to transmit those data to another controller.
<b>Submit a complaint</b>	You can also submit a complaint if you consider that Capgemini is infringing applicable data protection regulation(s) or the BCR.





Please note that these rights may be limited in some situations under applicable law. For instance, if granting you access to your Personal Data would reveal Personal Data about another individual; or if you ask Capgemini to delete your Personal Data while it is required by law to keep it.

### How to exercise your rights?

To exercise your rights, or if you have any questions or concerns related to our data protection policies, please contact us:

- By emailing us at the following address: [dpocapgemini.global@capgemini.com](mailto:dpocapgemini.global@capgemini.com)  
Please note that where relevant the Global Data Protection Office shall transmit your request to the local DPO;
- By writing to us at one of our offices which addresses you can find at the following link: <https://www.capgemini.com/fr-fr/nous-contacter/#undefined>
- By contacting by phone one the Capgemini office of your country.

In order to allow us to address your request, please provide us with the following information:



- **Your full name\***
- Your status (employee, applicant, etc.)
- **Your email address or other preferred means of communication\***
- Identity verification: you may be asked to provide suitable identification documentation
- Country / Region
- **The nature of your request\***

*\* Without this information, Capgemini will not be able to address your request.*

### How will Capgemini handle your request?

Your request will be submitted to the competent Data Protection Officer depending on the Capgemini entity you will be addressing the request to. You will then receive an email acknowledging the receipt of your request. Capgemini shall strive to address your request without undue delay, and no later than 1 month after acknowledging receipt of your request. If your request is particularly complex, or if you sent several requests, the time for a response can be extended by a further 2 months. We would inform you of any such extension within a month after receiving your request.


If you choose to submit your request through electronic means, and unless you request otherwise, Capgemini shall provide you with the information in a commonly used electronic format.

Even though we strongly encourage you to follow this process to submit your request, please note that you can also file a complaint with a Supervisory Authority; and/or seek judicial remedy in court.



## How will Capgemini address your request?

Once Capgemini has processed your request internally, you will be informed – through the preferred means of communication you indicated – and receive the information relevant to your request. Please find in the table below how Capgemini addresses Data Subjects’ most common requests:

 <p><b>Access your Personal Data</b></p>	<p>Capgemini shall first confirm to you whether or not it is processing your Personal Data; if that is the case, it will provide you with a copy of your Personal Data and all the relevant information on the processing.</p>
<p><b>Request the deletion of your Personal Data</b></p>	<p>If the request is justified, the Data Protection Office dealing with your request shall instruct the relevant function(s) to delete your Personal Data.</p>
<p><b>Request the rectification of your Personal Data</b></p>	<p>The Data Protection Officer dealing with your request shall instruct the relevant function(s) to rectify your Personal Data; and you shall receive confirmation that your Personal Data has been rectified or updated.</p>

Please note that upon receiving your request, the competent Data Protection Officer shall perform a first assessment to determine whether:

- Capgemini needs further information to handle your request:

or

- your request cannot be handled. In this case, we would explain the reasoning behind our conclusion.



## Where Capgemini is acting as Processor

Where Capgemini is processing Personal Data on behalf of a data Controller, Capgemini strongly encourages you to submit your request directly to the Controller.

In any case, if Capgemini receives a request directly, it shall notify the data Controller without undue delay according to the terms and conditions agreed between Capgemini and the Controller.

Should Capgemini be instructed by the Controller to handle your request directly, Capgemini shall follow the above-mentioned procedure in close coordination with the data controller.



## About Capgemini

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Capgemini is a global leader in partnering with companies to transform and manage their business by harnessing the power of technology. The Group is guided everyday by its purpose of unleashing human energy through technology for an inclusive and sustainable future. It is a responsible and diverse organization of over 340,000 team members in more than 50 countries. With its strong 55-year heritage and deep industry expertise, Capgemini is trusted by its clients to address the entire breadth of their business needs, from strategy and design to operations, fueled by the fast evolving and innovative world of cloud, data, AI, connectivity, software, digital engineering and platforms. The Group reported in 2021 global revenues of €18 billion.

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