

DT Global Privacy Policy (Global)



DT Global has issued this Global Privacy Notice (“Privacy Notice”) to provide you, working on behalf of the Company and its subsidiaries and affiliates (collectively with DT Global, “DT Global” or the “Company”), with a notice about how DT Global collects, uses, and processes your information.

We will only process your personal information in accordance with this Privacy Notice unless otherwise required by applicable law. We take steps to ensure that the personal information that we collect about you is adequate, relevant, not excessive, and processed for limited purposes.

1. Definitions

Personal Information: any information relating to an identified or identifiable, natural person.

Process or Processing: any operation or set of operations that are performed on this information, whether manually or using automated processes. Examples of operations include collecting, recording, organizing, storing, updating or modifying, retrieving, consulting, using, disclosing by transmission, disseminating or making available in any other form, linking, aligning or combining, blocking, erasing, or destroying the Personal Information.

Sensitive Personal Information: is defined by local law and may include Personal Information relating to an individual’s racial or ethnic origin, political opinions, religious or political beliefs, sexual orientation, trade-union membership, health or medical conditions, sex life, social security number, or criminal records.

This Policy does not cover data rendered anonymous. Data is rendered anonymous if individual persons are no longer identifiable.

2. Privacy Notice

DT Global collects information about you in order to properly evaluate and compensate you for a particular job position or salary grade. This information is tailored to adhere to applicable employment law, as well as other laws, to ensure the quality of our products and services and provide a safe workplace.

The following are some examples of the general categories of Personal Information collected and maintained by DT Global:

- **General Information:** name, date of birth, residence address, passport number and holder, national ID number, telephone, e-mail, and/or professional experience record.
- **Remuneration:** salary, salary grade, bank account numbers, and/or job title.

3. Purposes for Processing Personal Information

DT Global processes Personal Information to manage business operations, payroll administration, accounting and auditing, assessing qualifications for a particular job or task, safety, and security purposes. These principal purposes include:

- **Human Resources and Personnel Management:** DT Global uses information as appropriate to maintain a workforce for DT Global. Some examples are recruiting, salary calculation and payment, administering labor agreements, managing careers and development, evaluating your performance, training, complying with applicable legal requirements, sharing data with Company affiliates, and communicating with you and your representative(s).
- **Business Process Execution and Management:** DT Global uses information to run its operations. Some examples are workforce structuring and restructuring; project management and proposals; managing DT Global assets, hotlines, and employee directories; and business travel management.
- **Safety and Security:** DT Global uses information as appropriate to ensure the safety and protection of DT Global employees, resources, and workplaces. This includes measures such as protecting occupational health and safety, conducting investigations, and recording and monitoring network activity to identify and prevent malicious activity or the release of information from DT Global resources.

As a global company, DT Global transfers your personal information to the United States and to other jurisdictions in order to meet our business and legal requirements. The applicable legal protections in such jurisdictions may not be the same as those afforded in your own jurisdiction.

4. Special Categories of Personal Information

DT Global may need to collect Sensitive Personal Information. If the law in the country where the information is collected requires it, DT Global will only process this information with your explicit consent. In countries or regions where the EU-U.S. Privacy Shield applies, you will be asked to opt-in to any transfers or uses of Sensitive Personal Information.

5. Disclosures

Affiliates: DT Global entities share information among DT Global subsidiaries and affiliates for the purposes described in this Privacy Notice where consistent with applicable legal requirements.

Third Party Agents and Contractors: At times, DT Global entities may decide to share Personal Information to selected affiliated or third-party agents and contractors to perform services on their behalf.

Other Third Parties: DT Global entities disclose certain Personal Information to other third parties: (1) where required by law or legal process (e.g. to tax and social security authorities); (2) where DT Global determines it is lawful and appropriate to perform under an employment or labor agreement or otherwise consistent with the nature of the employment or other relationship; (3) to protect DT Global's legal rights (e.g., to defend a litigation suit or pursuant to a government investigation or inquiry) or to protect Company employees, resources, and workplaces; or (4) in an emergency where the health or security of you or other person or entity is at stake.

As noted above, DT Global may disclose Personal Information to entities located in the United States and other jurisdictions in order to meet our business and legal requirements. The applicable legal protections in such jurisdictions may not be the same as those afforded in your own jurisdiction. DT Global may be required to disclose Personal Information in response to lawful requests by public authorities, including meeting national security or law enforcement requirements.

6. Security and Confidentiality

DT Global takes reasonable and appropriate steps to protect Personal Information against unauthorized access, loss, misuse, disclosure, alteration, destruction, and other Processing of Personal Information. These measures take into account the sensitivity of the Processing operation and Personal Information concerned, and the risks involved.

DT Global will restrict access to Personal Information to those employees, agents and contractors of DT Global who do not have a legitimate business need for such access.

Communications and network security controls have been put in place that require authentication to access computer systems, networks, and other resources. Safeguards are in place to alert DT Global when an actual or suspected unauthorized access takes place. Use of our computer resources is subject to the DT Global Code of Business Ethics and Conduct and any applicable electronic communications policies, which are not superseded by this Privacy Notice.

7. Data Retention

Except as otherwise permitted or required by applicable law or regulation, we will only retain your Personal Information for as long as necessary to fulfill the purposes we collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes. To determine the appropriate retention period for Personal Information, we consider our statutory obligations, the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of your Personal Information, the purposes for which we process your Personal Information, and whether we can achieve those purposes through other means. We specify the retention periods for your Personal Information in our records management retention schedules.

Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent. Once you are no longer providing services to us, we will retain and securely destroy your personal data in accordance with our policies and applicable laws and regulations.

8. Your Rights

You will be provided access to your own Personal Information as required by and in accordance with applicable law. Requests for access, and in general, all data protection related requests, may be made to the local or regional data protection officer, if applicable, or to the local Human Resources department.

We may ask you to provide us with certain information to help us verify your identity and your right to access the personal information we have about you or to make the changes you have requested. Applicable law may allow or require us to refuse to provide you with access to some or all of the Personal Information that we hold about you, or that we may have destroyed, erased, or made your personal

information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

9. Personal Information

DT Global commits to resolving complaints about our collection or use of your Personal Information. Individuals with inquiries or complaints regarding DT Global's Privacy Policy should contact the DT Global Ethics Hotline or GeneralCounsel@DT-Global.com.

You are responsible for making sure that the Personal Information that DT Global holds about you is accurate, complete, and up-to-date. If you believe any of your Personal Information is inaccurate or incomplete, you can ask DT Global to update it. You may also request to delete Personal Information. DT Global will correct or delete Personal Information as required by applicable law.

Where you have provided your consent to the collection, processing, or transfer of your Personal Information, you may have the legal right to withdraw your consent. To withdraw your consent, if applicable, contact us at GeneralCounsel@DT-Global.com

10. Other Important Information

This Privacy Notice effective as of July 1, 2019.

Privacy laws and guidelines are part of a constantly changing environment. DT Global reserves the right, at its discretion, to change, modify, add, or remove portions of this Privacy Notice or any supplemental privacy notice at any time. Any material change to this Privacy Notice will be provided to you. Any questions regarding this Privacy Notice should be addressed to your local Human Resources department, or to our General Counsel at GeneralCounsel@DT-Global.com.

11. Version History

Version Control	Effective Date	Approved by	Amendment
V 1.0	1 July 2019	DT Global Leadership Team	First Version
V 1.1	15 March 2023		Copyedits