

Infosys Limited, Plot No. 44 & 97A, Electronics City, Hosur Road, Bangalore 560100, India including its subsidiaries, associates and affiliated Companies (Collectively referred to as “Infosys”) provides this Privacy notice ("Notice") to inform you (“you/your”) of its procedures regarding the collection and use of your Personal Information (“PI”) that Infosys may collect and receive from you or that its service provider Convercent may collect from you in connection with its whistleblower program (as set out in Whistleblower policy).

Infosys is committed to carry out any processing of your PI collected under its whistleblower program as per the relevant laws of your jurisdiction, and hereby notifies you of the following information regarding such processing.

Personal data elements collected: PI collected by Infosys and transferred to Convercent, or PI collected directly by Convercent through its systems, can include your name, location and contact details should you identify yourself when reporting a concern through this portal. You hereby note that by choosing to identify yourself, you consent to have your PI processed including disclosure of your identity to certain recipients as set out in this Notice.

It can also include any PI provided by you in the course of detailing your concern, for instance, relating to any individuals involved in or made aware of the incident and other artefacts relating to such complaint.

Purpose of collection:

- Infosys recognizes that PI provided when reporting a concern can relate to yourself as well as others mentioned in the complaint. Such PI will be collected/processed by Infosys/Convercent for the following purposes, as part of Infosys’ legal obligations:
  - For Infosys to review and investigate as appropriate complaints reported through this whistleblowing portal involving any suspected or potential violation of applicable law or company policy including but not limited to the Code of Conduct and Ethics.
  - For Convercent to send reports to Infosys.
- PI may be processed on the basis of Infosys’ legitimate business interests for the following purposes:
  - To defend/manage any claim or investigation against Infosys.
  - For storage purposes.
  - To manage compliance requirements and where applicable, to respond any data subject rights requests or from management of incidents/breaches involving data
- This is in addition to the consent provided by you if you choose to identify yourself when reporting a concern through the whistleblower program.

Data Recipients: PI collected will be accessed by:

- Authorized administrators from Infosys involved in the investigation
- Authorized administrators from Convercent only on request by Infosys.

#### Data Security:

- Appropriate measures will be taken to prevent unauthorized access, unlawful processing, unauthorized or accidental loss or destruction of the PI.
- Infosys adopts reasonable security practices and procedures, in line with the international standard ISO 27001 which includes, technical, operational and physical security controls in order to protect your PI.
- Convercent is bound to protect your PI by means of appropriate Data Protection clauses in the contract between Infosys and Convercent including its confidentiality obligations.

Data Storage: PI listed above may be accessed from countries outside of the country where data is collected, which may have data protection legislation differing from that of the EEA. Infosys will take the necessary steps to ensure confidentiality and secrecy of data so transferred. In particular, Infosys has executed Standard Contractual Clauses (under Art. 46 (2) (c) of the GDPR), copies of which can be obtained by writing to [privacy@infosys.com](mailto:privacy@infosys.com)

Data Retention: PI will be retained by Infosys and Convercent in line with applicable business and regulatory requirements.

Data Subject Rights: As a data subject, you will be provided 'read only' access in the portal to track your concerns. You can always edit your information (rectify erroneous, data about you) by calling the helpline number mentioned in the Infosys Code of Conduct and Ethics, or by availing of the support links provided in this OIC landing page.

Contact your Data Protection Officer: If you have any queries, comments or requests you can reach out to our Data Protection Officer, Srinivas P via email at [privacy@infosys.com](mailto:privacy@infosys.com) or by dialing +91 80 2852 0261.

Contact your local Data Protection Authority: If you have any concerns with how your PI is being collected and stored you have the right to bring a complaint to your local data protection authority.