

Document Control Information

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Privacy Statement and Terms of Use

As part of its business, it is a requirement for Excelity to gather and process personal data in order to operate effectively and provide our services. This is done in accordance with the applicable data protection and/or privacy laws of the countries in which Excelity operate / collect the data.

Excelity is committed to protecting your privacy. This Privacy Statement and Terms of Use explains how Excelity uses and protects the information we collect. It applies to any personal information you provide to Excelity and is subject to local law or any personal information we collect from other sources.

Excelity has a Global Privacy Policy that applies to all Excelity group companies. This Privacy Statement and Terms of Use refer to all Excelity group companies and all Excelity group companies are required to comply with this. This Privacy Statement and Terms of Use explains how Excelity collects, uses and discloses Personal Information from their websites.

What type of information does Excelity collect?

We may collect Personal Information/ Personal Data (including personally identifiable information) such as your name, contact details, date of birth, gender, marital status, medical details, financial details, tax details, employment details and benefit coverage. We may also collect sensitive information about you such as criminal convictions or health information in relation to life, health, professional liability and workers compensation insurance or employee benefit programs sponsored by your employer. When you provide information that enables us to respond to your request for products or services, you consent to our collection, use and disclosure of this information to appropriate third parties for the purposes described in this Statement.

This includes collecting information when you:

Visit Excelity Websites

In some instances, Excelity automatically collects certain types of information when you visit our websites and through e-mails that we may exchange. Automated technologies may include the use of web server logs to collect

IP addresses, "cookies" and web beacons. The collection of this information will allow us to improve the effectiveness of Excelity websites and our marketing activities.

By using Excelity websites, associated microsites and applications, you agree to the processing of your information as explained in this Statement.

Excelity websites may contain links to other sites which are outside our control and are not covered by this Statement. We encourage you to review the privacy statement of each website you visit.

Access our Websites through Mobile Devices

If you access our websites on your mobile telephone or mobile device, we may also collect your unique device identifier and mobile device IP address, as well as information about your device's operating system, mobile carrier and your location information.

How does Excelity use your personal information?

We use your Personal Information to offer and administer our services and products. With your consent, we may also use this information for additional purposes.

This policy sets the requirements to ensure that Excelity:

- Comply with applicable data protection and privacy laws and follow best industry practices;
- Protect the rights of our employees, clients and their employees and our partners;
- Is open about how Excelity process and deal with persona data; and
- Protect ourselves from the risks of a data breach.

When acting as custodian of Personal Data, Excelity have a legal and contractual duty to ensure that the data is handled properly and securely at all times, irrespective of whether it is held in electronic or physical form. The data is held at all times in a secure manner throughout the whole data lifecycle, namely:

- The obtaining of personal data;
- The storage and security of personal data;
- The use of personal data; and
- The disposal/destruction of personal data.

This policy applies to all Personal Data that is processed by Excelity, including Personal Data of client's employees.

While providing access to Personal Data, it is ensured that:

- Only individuals who are authorized to use information can access it;
- Information is accurate to the extent provided and suitable for the purpose for which it is being processed;
- Authorized persons can access information if they need it for authorized purposes; and
- Personal Data is never stored or transported on a laptop or any mobile or portable storage device, nor sent unencrypted through any channel (unless a recorded exception applies).

What Data Privacy Principles Are Followed

To comply with the applicable laws, following data privacy principles are followed by Excelity while processing Personal Data:

- Process lawfully, fairly and transparently;
- Process for a specific reason (purpose limitation);
- Process on a limited basis (data minimization);
- Process accurately and ensure that data is up-to-date;
- Process for a limited period (storage limitation);
- Process with integrity and confidentially; and
- Process securely.

These principles are internationally accepted principles of data protection, and are not intended to, nor do they, replace any existing and applicable law. In the event of any contradiction with applicable law, the provision of the law applies.

Does Excelity disclose your personal information?

We do not rent, sell or otherwise disclose Personal Data about our website visitors with third parties for their own marketing use except with your consent.

We may disclose Personal Data to business partners and service providers that are necessary to provide and administer our products and services. Furthermore, if required, we may disclose Personal Data to respond to government official requests, to prevent physical harm or in the event of a merger/acquisition.

Does Excelity transfer your personal information across geographies?

Excelity may transfer certain Personal Data across geographical borders to Excelity entities or service providers in other countries working on our behalf in accordance with applicable law. By providing us with your information or using our websites, you consent to the collection, international transfer, storage, and processing of your information.

How can you access and update your information?

Excelity takes reasonable steps as per best industries practices to keep your Personal Data accurate and complete. If you have created a profile or account on one of our websites, you can update your contact information after you log into your account. You can also contact us at the e-mail info@excelityglobal.com.

Does Excelity have security measures in place to protect your information?

Excelity has a robust information security program that contains administrative, technical and physical controls that are designed to safeguard your Personal Data. Excelity use best industries practices to secure

the Personal Data when it is being collected and transmitted over the Internet as well as firewalls, site monitoring and intrusion detection software.

As a matter of precaution, you should also take all reasonable steps to protect your information. You may follow following good practices:

- choose a strong password
- and do not use the same password that you use on other sites
- do not share your password with anyone else
- sign out of the website and close your browser

Excelity will never ask you for your password in an unsolicited phone call or in an unsolicited e-mail.

Any other service providers and agents, if engaged, are contractually bound to maintain the confidentiality of Personal Data and may not use the information for any unauthorized purpose.

Does Excelity collect information from children?

Our websites are not directed to children and we do not knowingly collect Personal Data from children on our websites.

Mobile Application

You may access your account, interact with us online and receive other information via your smartphone by using Excelity's mobile applications. All Personal Data collected through mobile applications is protected by the terms of this Privacy Statement and Terms of Use.

Consent

Processing of sensitive Personal Data is often subject to specific requirements (e.g., obtaining express consent before processing, confidentiality agreements and/or enhanced safeguards) under applicable laws.

By logging in to the account on our website/ microsites or by installing the mobile application or logging in you agree to this Excelity Privacy Policy: Privacy Statement and Terms of Use and permit Excelity to use your Personal Data for the purpose mentioned herein.

Excelity websites/ mobile applications verifies your identity through your use of your user ID and password. When you enter your user ID and password on this site and select Log On, you understand and agree that:

You will not use this site or data from it for any purpose other than as intended for your role as an employee or contractor of your company.

You will contact your HR Administrator or Excelity immediately if you have any reason to believe that someone has gained unauthorized access to your user ID and password.

You are an employee or contractor of your company and Excelity is delivering this site/ mobile application and the associated services as a third-party provider to your company. You understand that you are not an employee of Excelity and that Excelity is not providing direction or control over your employment or other work relationship with your company through your use of this site and its associated services.

Amendment

We reserve the right to update and amend this Excelity Privacy Policy: Privacy Statement and Terms of Use from time to time.

Email Us

If you have any questions relating to this Statement, please send mail to corp.compliance@Excelityglobal.com.

PRIVACY STATEMENT FOR EUROPEAN DATA ONLY

In addition to the aforesaid, Excelity addresses the processing of personal data in its role as a data processor in the course of delivering services, where such personal data is subject matter of General Data Protection Regulation.

Excelity shall process such client data on behalf of the client, only in accordance with the Service Agreement (including instructions received from the client time to time), or as needed to comply with any applicable law.

The personal data (including Special Categories of Data) processed by Excelity is data pertaining to client employees needed for providing services client, as required by EEA applicable law and for the following additional purposes in relation thereto:

- a. a. processing, storage, and other processing needed for business continuity and disaster recovery;
- b. system security and network administration,
- c. authentication and access control;
- d. Other required controls required to safeguard the security and integrity of transactions;
- e. As required under obligation in the client contracts to safeguard interest of client, Excelity and its partners; and

Upon severance of the statutory, contractual and/or legal obligations, the data is duly returned or destroyed in appropriate manner subject to GDPR and other applicable laws.

Sub-processing

Third Party sub-processors may be engaged for processing client personal data only with prior approval of client and under a written legal contact. The contract with sub-processor shall imposes similar data protection-related processing as are there in the client contract. EU model clauses are followed for sub-processing such personal data.

Security Requirements

As stated aforesaid, Excelity robust technical, physical, and organizational measures to protect client data including personal data to safeguard from any data breach, misuse or accidental, unlawful, or unauthorized destruction, loss,

alteration, disclosure, acquisition, or access during the Processing. The safeguard meets the requirements of GDPR or any stricter requirements, as imposed under the client agreement.

Access to personal data is authorized only to the extent necessary to provide data processing services and other contractual obligations. All Excelity employees mandatorily follow data privacy and confidentiality obligations as required in relation to such data.

Consent

Processing of sensitive Personal Data is often subject to specific requirements (e.g., obtaining express consent before processing, confidentiality agreements and/or enhanced safeguards) under applicable laws.

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Excelity Global

Document Classification - Public

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Compliance

Any request by client in relation to client personal data is dealt timely and appropriately.

Any client employee intending to amend or modify own personal information is permitted to do so on their own directly to the extent permitted under client contract. For personal data which cannot be modified by client employee, client employee can route requirement through their HR Administrator.

If any client employees suspect that any Excelity employee has violated this policy, such employee may file a written complaint by writing to Compliance Officer/ Data Privacy Officer corp.compliance@Excelityglobal.com.