



Jidoka Privacy Notice

WHAT IS THE PURPOSE OF THIS NOTICE?

This Privacy Notice (“Notice”) outlines how Personal Information of clients, prospective clients, former clients, visitors, vendors and other third parties we interact with (“External Individuals”) is collected, managed and Processed by Jidoka. Jidoka is committed to handling the Personal Information of all External Individuals in an appropriate and lawful manner. This Notice sets out the minimum requirements for ensuring that the Personal Information of External Individuals is collected, used, retained and disclosed in a secure and compliant manner.

WHAT OTHER RULES OR NOTICES APPLY?

In some cases, local laws and regulations that apply to the Processing of Personal Information may be more restrictive than this Notice. Where this is the case, the more restrictive requirements will apply. Where required by local laws, Jidoka will provide you with additional privacy notices or information. In addition, this Notice may be supplemented from time to time with more specific privacy information or notices, for example when you visit a Jidoka website, attend an event or use particular Jidoka apps or portals.

CONTACTS

Any questions, concerns or complaints about the operation of this Notice should be addressed to your relevant client partner, account executive, business development contact, procurement contact or Jidoka’s Data Protection Office (see Contact Us section below). This Notice may be updated from time to time.

WHO IS THIS NOTICE DIRECTED TO?

This Notice applies between you, as an External Individual, and the Jidoka company that you interact or engage with or that communicates with you in relation to services or solutions provided by Jidoka, or the Jidoka company to whom you provide or wish to provide your goods or services. If you are unsure as to which Jidoka company is applicable to you, please Contact Us (see Contact Us section below). This Notice applies to all External Individuals with regards to your Personal Information. This Notice does not apply to Personal Information belonging to Associates (as defined below) employed or contracted by Jidoka. This Notice also does not apply to Personal Information Processed by Jidoka on behalf of clients as part of Jidoka’s services.

WHAT ARE WE GOING TO TELL YOU IN THIS NOTICE?

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Capitalized terms are defined at the end of this Notice, in the [Definitions section](#).

How we collect and use your Personal Information

Jidoka will only collect Personal Information relating to External Individuals to the extent that it is required for a particular purpose or purposes, in the context of its business. Read about the purposes in the next section “Why we need to collect your Personal Information”.

Jidoka may collect or Process any or all of the following types of Personal Information about External Individuals as part of its business activities: Personal Information Category	Examples of Personal Information we may collect within each category include:
Identity information	Title, full name, photograph, gender, date of birth.
Contact details	Employer details, job title, work address, phone number(s) and email address(es), emergency contact details and number, social media handles.
Personal details	Languages and information that an External Individual volunteers in their course of dealings with Jidoka, such as through networking events (which could involve the disclosure of data about religion to facilitate prayer room access, ethnicity or sexual orientation).



Marketing information	Contact history, interactions and communications with Jidoka, events attended, Jidoka information and materials (e.g. whitepapers) provided, contact preferences.
Health information	Meal preferences, food allergies, access requirements for physically challenged.
Relationship management information	Communication and meeting dates, education and qualifications, references, professional experience, membership of professional bodies, information about complaints and feedback.
Data related to use of and access to facilities and corporate assets	Time and location of entry and exit to premises, access to restricted zones and security camera footage data related to access to and usage of office equipment and corporate assets including fixed and mobile phones, computer systems, email and the intranet/internet, location identifiers, multifunctional devices, cost recovery systems, document management systems, car service pick up and drop off logs, contact management systems and online databases.
Background screening information	Criminal history, political exposure.

Personal Information of others provided by you. In certain situations, including visiting our offices, you may provide to us the Personal Information of others (e.g. your colleagues). It is your responsibility to inform the nominated individual about the Processing of their Personal Information for the described purposes and to confirm, if required by law, that they have given their permission.

Why we need to collect your Personal Information

Purposes

Jidoka uses External Individuals' Personal Information for a variety of purposes. The most common uses of Personal Information are:

- Managing client requests, projects and bidding for work;
- Marketing activities and market research;
- Managing vendor relationships and invoicing and determining eligibility of vendors including verification of references and qualifications and other background checks;
- Managing client relationships;
- Investigating complaints and issues;
- Organizing meetings and networking events;
- Business continuity management;
- Security and compliance with law, including health and safety requirements; and
- Developing resource plans to meet business demands.

In order to comply with legal and regulatory obligations and to the extent permitted or required by local law, and specifically to ensure that we can comply with applicable trade control, anti-money laundering and/or anti-bribery and corruption laws, we may carry out background screening checks on current and prospective clients, vendors and business partners, both pre and post contract. In addition to screening individuals and legal entities with whom we enter into contracts, this screening may cover individuals such as directors, officers, sole traders, shareholders and other key stakeholders. The screening utilizes publicly available information, including government issued sanctions lists and media sources. The information obtained through background screening may include Personal Information



regarding suspected or actual criminal behavior, criminal records or proceedings and unlawful behavior.

An extensive list of the purposes for which we may collect your Personal Information is set out in the table below. Where Jidoka wishes to use Personal Information for a new purpose that has not been notified to the External Individual, where required by law, Jidoka will notify the External Individual of the new purpose.

Legal Basis for Processing

Jidoka will Process Personal Information relating to External Individuals where it is required by law, necessary for the performance or administration of a contract, or where it has a legitimate business interest in doing so. Jidoka will Process Sensitive Personal Information where it is necessary for the purpose of carrying out a legal obligation or exercising specific rights of Jidoka permitted by local law. Jidoka will obtain your consent to Process your Personal Information where it is required to do so by local law, and where required, for any new or additional purpose. Under local law, to the extent that Processing is based on consent, External Individuals may be entitled to withdraw consent to the Processing of their Personal Information. External Individuals who wish to withdraw consent should follow the instructions received at the time of providing consent or contact us (see Contact Us section below).

The primary legal basis of Processing is set out in the table below. Purpose of Use

Legal Reason for Processing

For vendor and client relationship management

Managing requests from clients including Jidoka's bids for work, conducting such work, invoicing clients and investigating complaints and other issues.

- Necessary for Jidoka's legitimate interests (to run a successful and efficient business).

Managing vendor and business partner relationships and determining eligibility of vendors and others including verification of references and qualifications and other background screening checks.

- Necessary for compliance with Jidoka's legal obligations as a business entity.
- Necessary for Jidoka's legitimate interests (to run a successful and efficient business).
- Consent

For compliance with legislation and policies

Managing, monitoring and investigating compliance with all relevant legal, regulatory and administrative obligations and responsibilities, whether in the jurisdiction where you are based or elsewhere.

- Necessary for Jidoka's legal obligations as a business entity.
- Necessary for Jidoka's legitimate interest for monitoring compliance with regulatory obligations.

Monitoring and investigating compliance with Jidoka policies.

- Necessary for Jidoka's legitimate interests to ensure compliance with our policies.

For organizing and maintaining our business structure

Development of central databases with respect to the Personal Information of all External Individuals, including databases used by subsidiaries or branch offices for client and vendor management.

- Necessary for Jidoka's legitimate interests (to run a successful and efficient business).



Business development

- Depending on the situation, either with the consent of the data subject, or where necessary for Jidoka's legitimate interests (to run a successful and efficient business).

For Security & Business Continuity

Management of access controls and usage of buildings and facilities (including CCTV and parking lots).

- Necessary for Jidoka's legitimate interests (to comply with its responsibilities to run a safe, secure and efficient business).

Management of access to and usage of office equipment and resources including but not limited to telephones, mobile phones, laptops and portable devices, multifunctional devices and more generally the computer network and applications.

- Necessary for Jidoka's legitimate interests (to protect Jidoka's finances and help prevent fraud).

Maintaining the security of Jidoka's and its client's networks and information and intellectual property.

- Necessary for Jidoka's legitimate interests (to run a successful and efficient business).

Detecting, preventing or otherwise addressing security, fraud or technical issues.

- Necessary for Jidoka's legitimate interests (to run a successful and efficient business and help prevent fraud).

To whom we give your Personal Information

Disclosure to third parties. Jidoka may also share your Personal Information:

- With clients and potential clients in the course of business and business development;
- With suppliers, subcontractors and service providers, to maintain an efficient and commercially viable business, including caterers and security contractors if you visit Jidoka's premises;
- With professional advisers and consultants;
- With legal advisors and external auditors for legal advice and to conduct business audits;
- With credit reference agencies and background verification agencies, to conduct credit checks and background verification and reference checks;
- With service providers for business continuity management and contingency planning in the event of business disruptions; and
- With prospective sellers or buyers and their advisers in the event that Jidoka merges, acquires or sells any business or assets.

The third parties with whom we share your Personal Information may in some instances independently determine the purposes and uses of your Personal Information (e.g. legal advisers and external auditors); in such cases, the recipient's own privacy policy will govern their use of your Personal Information.

Disclosure without notification. There may be circumstances where Jidoka discloses Personal Information to third parties without notifying External Individuals. These circumstances could include:

- Where the information is publicly available;
- Where Jidoka is required to do so by law or by order of a court or tribunal, or where Jidoka has a good faith belief that such disclosure is reasonably necessary to comply with a legal obligation, process or request;
- Where it is alleged by a law enforcement authority that an External Individual is guilty of a criminal offence, or is civilly liable in a



legal action, and Jidoka has a good faith belief that any disclosure is necessary to comply with a legal process or request.

- Where Jidoka is legally required to, or has a good faith belief that such disclosure is reasonably necessary to protect the rights, property or safety of Jidoka, its employees, contractors, job applicants, vendors, clients, customers of clients, third parties or the public as required and permitted by law.

International transfer of your Personal Information

Due to the global nature of Jidoka's business, Personal Information may be shared, disclosed and transferred between the various Jidoka group companies where such transfers are required for legitimate business reasons. Where Jidoka transfers your Personal Information internationally, which may include transferring Personal Information outside your country of domicile, Jidoka will comply with applicable legal requirements. Where required we will sign a data transfer agreement with the recipient of the Personal Information, which in the case of Personal Information originating from the European Economic Area, Switzerland and the United Kingdom, may include the Standard Contractual Clauses.

How we monitor your activities

Where permitted by local law, Jidoka may monitor the activities of External Individuals at Jidoka or client facilities using CCTV. Where required, signage will indicate which areas are subject to such monitoring. Recorded images are destroyed in accordance with our retention policy, unless they are required for criminal or other investigations (including circumstances where we are required to provide such information to clients for the purposes of their investigations).

In addition to the above and where permitted by local law, Jidoka may monitor its company assets, including computers, telephones, fax machines, voice mail systems, etc., and its networks, including intranet/internet access, email, applications, etc., and the activities of External Individuals while accessing or using such office equipment or networks as set out in our Acceptable Use Policy.

If you have further questions, please contact us (see Contact Us section below).

How long we retain your Personal Information

Jidoka will retain Personal Information for as long as necessary for fulfilling the purpose or purposes for which it was collected. This generally means that Personal Information will be deleted at the latest 6 years after collection unless longer retention is required for other valid reasons such as compliance with legal obligations, to resolve disputes or enforce contracts.

How we protect your Personal Information

Jidoka implements appropriate security measures designed to prevent unlawful or unauthorized Processing of Personal Information and accidental loss of or damage to Personal Information. Jidoka maintains written security management policies and procedures designed to prevent, detect, contain, and correct violations of measures taken to protect the confidentiality, integrity, availability, or security of your Personal Information. These policies and procedures assign specific data security responsibilities and accountabilities to specific individuals, include a risk management program that includes periodic risk assessment and provide an adequate framework of controls that safeguard your Personal Information.

What are your rights?

Certain Jidoka systems may allow External Individuals to check and update certain Personal Information. Where applicable, it is the responsibility of all External Individuals to ensure that their Personal Information is kept up-to-date. Where permitted under applicable laws, External Individuals have the right to access their Personal Information, verify and challenge the accuracy and completeness of their Personal Information and have it corrected, amended or deleted if inaccurate and, in limited circumstances, object to Processing of their Personal Information or ask for Processing to be restricted. Jidoka may require External Individuals to provide reasons or evidence to justify the



amendment of Personal Information held by Jidoka. In addition, where applicable, External Individuals can ask for their data to be moved to another controller. Where Jidoka is Processing Personal Information on the basis of consent, External Individuals can withdraw that consent at any time. However, please note that if you withdraw your consent, you might not be able to use service or feature that require collection or use of such Personal Information. External Individuals can exercise these rights by contacting us per the Contact Us section below. External Individuals can also unsubscribe from marketing sent by Jidoka at any time by following the instructions received in the relevant marketing communication.

Contact Us

Any questions, concerns or complaints about the operation of this Notice should be addressed to your main or usual Jidoka contact in the first instance (e.g. your relevant client partner, account executive, business development contact or procurement contact) or, if you do not have a Jidoka contact, to Jidoka's Data Protection Office at HR@Jidoka.com. If you wish to access the Personal Information we hold about you or exercise any of your other legal rights in respect of your Personal Information, please contact HR@Jidoka-tech.com.

In addition to contacting us, in certain countries you have the right to lodge a complaint with your local data protection authority if you so choose.

Grievance Redressal Officer: Mr Sekar Udayamurthy

Email ID: sekar@jidoka-tech.com

Definitions

- "Employee" means any current, past and prospective employees, individual contractors or other members of personnel of Jidoka.
- "Personal Information" is defined under applicable law but may include any information or combination of information, in any form or medium that can identify an External Individual. Examples include name, email address, physical address, phone number, date of birth, age, home address, personal preferences, behavioral information, government issued IDs, IP address, hardware identifiers, etc.
- "Sensitive Personal Information" means Personal Information, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. Examples of Sensitive Personal Information in various jurisdictions may include social security numbers, driver's license numbers, passwords, passports, tax IDs, financial account and credit card numbers, health information (including Protected Health Information (PHI), biometric identifiers, racial or ethnic origin, and information about political opinions, religious beliefs, trade union membership, criminal history, sexual orientation or blood group, as well as any other information deemed sensitive under applicable data protection laws.
- "Process/Processed/Processing" means any operation or set of operations which is performed on Personal Information or on sets of Personal Information, whether or not by automated means, such as collecting, recording, storing, deleting, viewing, accessing, amending, using or disclosing the Personal Information.
- Note, where we have used words such as "include," "including," "for example," or "such as" in this Notice, these are meant to be examples and not exhaustive lists.

