

SpeakUp Data Protection and Privacy Notice

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The data privacy regulations of some countries require that a person reporting a concern containing personal data must be notified of certain collection and retention practices regarding the information submitted by that person and accepts the terms and conditions for the use of the SpeakUp helpline.

We therefore kindly ask you to provide your consent to the processing of your personal data as described herein. If you do not consent to the processing of your personal data as described herein, we are unable to accept any information through this system. In that case, you can use one of the other internal reporting channels to report the suspected misconduct, such as reporting to your manager or to a representative of the HR, Ethics, or Legal Departments.

1 General

The SpeakUp helpline is a voluntary, confidential web and phone-based intake system operated by Convercent, an independent service provider, and provided by Capgemini to its and its affiliates' employees, suppliers, customers and business partners ("Reporter").

The purpose of the SpeakUp helpline is to enable reporters to ask for advice and guidance or report concerns about accounting, auditing, corrupt practices, unfair competition and other misconduct not in compliance with our 7 Values or our Code of Business Ethics that may significantly affect vital interests of Capgemini and its affiliates.

In certain countries, the SpeakUp helpline can only be used to report suspected violations of a more limited number of matters. To know the exact scope of matters that can be reported in your country, please refer to section 6 of the present notice. If your concern pertains to a matter that, under local law, may not be accepted by Capgemini through the SpeakUp helpline, you will need to contact your manager or a representative of the HR, Ethics, or Legal Departments to report the matter.

The SpeakUp helpline and the secure database in which the personal data that you may report is stored, are operated by Convercent. All data is processed on a separate and secure server located in Ireland.

You may contact Capgemini with any questions relating to this Notice and/or the SpeakUp helpline by ethics@capgemini.com.

2 Use of the SpeakUp helpline

Use of the SpeakUp helpline is entirely voluntary. As a reminder, the normal route for reporting a possible violation is to do it directly to your manager or to a representative of the HR, Ethics, or Legal Departments. There may also be additional resources available in certain countries, such as staff representatives, grievance procedures or specific helplines.

If you feel that you are unable to follow the normal route for reporting a possible violation, you may use the SpeakUp helpline to report your concern.

Please be aware that the information you supply about yourself, your colleagues, or any aspect of the company's operations may result in decisions that affect others. Therefore, we ask that you only provide information that, to the best of your knowledge, at the time that the information is provided, is correct and factual. You will not be subject to disciplinary or adverse action by Capgemini for any report of a suspected legal or compliance violation that is made in "good faith", even if it later turns out to be incorrect. Acting in "Good faith" means acting with an honest belief and intention. Please be aware, however, that knowingly providing false or misleading information will not be tolerated.

The information you submit will be treated confidentially except in cases where this is not possible because of legal requirements or in order to conduct a proper investigation, in which case the information will be handled sensitively.

Where permitted under the law, you may remain anonymous, however, we encourage you to identify yourself to enable us to follow up with questions that we may have.

3 What personal data and information is collected and processed?

The SpeakUp helpline captures the following personal data and information that may be shared by you: (i) your name, your contact details and whether you are employed by Capgemini; (ii) the name and other personal data of the persons you name in your report if you provide such information (e.g., description of functions and contact details); and (iii) a description of the alleged misconduct as well as a description of the circumstances of the incident.

4 How will the personal data and information be processed after your report and who may access personal data and information?

The personal data and information you provide will be stored in a secure database which is located on servers hosted and operated by Convercent in Ireland. Convercent has entered into contractual commitments with Capgemini to secure the information you provide in accordance with applicable law. Convercent is committed to maintaining stringent privacy and security practices including those related to notice, choice, onward transfer, security, data integrity, access, and enforcement.

For the purpose of processing and investigating your report and subject to the provisions of local laws, the personal data and information you provide may be accessed, processed and used by the relevant personnel of Capgemini, including Ethics, Human Resources, Finance, Internal Audit, Legal, management, external advisors (e.g., legal advisors), and, in limited circumstances, by technical staff at Convercent. Those individuals may be located in the EU or elsewhere. In case of transfers of personal data outside of the EU, all Capgemini companies have entered into Intra-company Data Transfer Agreements modelled after the Capgemini Binding Corporate Rules; Convercent has entered into a Data Transfer Agreement based on EU standard contractual Model Clauses and also is certified and adheres

to the Privacy Shield Principles for the transfer of personal data specifically to the US (see the [Convercent Privacy Policy](#) for additional information).

Personal data and information you provide may also be disclosed to the police and/or other enforcement or regulatory authorities.

The personal data you provide will be kept as long as necessary to process your report, or, if applicable, as long as necessary to initiate sanctions or if the data needs to be kept for legal reasons. Otherwise personal data will be deleted within two months after closing the report or immediately in the event the report falls outside the scope of the SpeakUp helpline.

5 Rights of Report Subjects and Reporters

Capgemini will promptly notify any person who is the subject of a report on the SpeakUp helpline as to their status, except where notice needs to be delayed to ensure preservation of relevant information. The subject of the report has the right to access information concerning the report (with the exception of data that may allow to identify the Reporter) and to request correction of his/her personal data that may be inaccurate or incomplete in accordance with applicable law. The notice will inform the subject of a report on how to exercise these rights.

Similarly, Reporters also have the right to access information about them and to request corrections in accordance with applicable law. To exercise these rights, please contact ethics@capgemini.com.

6 Special Country Regulations

There are no specific restrictions for the following countries (as the date of April 2nd, 2017): Argentina, Australia, Austria, Brazil, Canada, China, Columbia, Germany, Guatemala, Hong-Kong, India, Ireland, Japan, Malaysia, Mexico, New Zealand, Norway, Philippines, Poland, Saudi Arabia, Singapore, Switzerland, Taiwan, United Arab Emirates, United Kingdom, United States, Vietnam.

Throughout much of the European Union and surrounding areas, concerns can only be reported relating to limited topics, typically accounting, auditing, bribery, competition law, discrimination and harassment and environment, health, hygiene, and safety matters. Further, some countries restrict reports such that only employees in key or management functions may be the subject of a report.

Any issues or concerns relating to topics not permitted by law to be reported via the SpeakUp helpline should be reported directly to your manager or a representative of the H R, Ethics, or Legal Departments as appropriate for the subject matter of the possible violation.

In some countries, anonymous reports may not be permitted under the law except under extremely restrictive circumstances.

Belgium

- The SpeakUp helpline may only be used by Capgemini employees to report on internal matters relating to bribery, financial, accounting and audit only.
- Any issues or concerns relating other matters that could affect Capgemini should be reported directly to your manager or to a representative of the HR, Ethics, or Legal Departments.
- Anonymous reports are not permitted under the law save under extremely restrictive circumstances.

Czech Republic

Reports can only be made relating to

- possible irregularities in
 - Unfair Competition;
 - Bribery or Corruption within the business of Capgemini;
 - Conflicts of interest;
 - Insider Trading;
 - The commission of a Criminal offence;
- serious cases of
 - Accounting, Auditing or Banking matters; or
 - Vital Company Interests being affected;
- in case of a serious threat to the health or safety of any team member; or
- Harassment or discrimination.

The Speak-Up line is not intended for grievances, being general issues about any team member's personal employment situation or about private matters of other team members.

Denmark

- Concerns can only be reported relating to serious misconduct or infractions, i.e., offences which entail serious misconduct or suspected serious misconduct that may impact the vital interests of the company or significant impacts to a person's health or life, such as e.g., economic crime (including bribery, fraud, forgery and similar offences) as well as irregularities in the areas of accounting and auditing, internal controls or financial reporting, anti-competition and insider trading but also cases of environmental pollution, serious violations of occupational safety rules and serious offences against an employee such as for instance violence or sexual offences.
- Any issues or concerns relating other matters that could affect Capgemini, considered to be less serious misconduct, such as cases of mental bullying, collegial difficulties, incompetence, absence, and breach of smoking and alcohol policies and workplace rules on the use of e-mails/internet, etc. should be reported directly to your manager or to a representative of the HR, Ethics, or Legal Departments.

Finland

- Concerns can only be reported relating to offences or misconduct in relation to accounting, internal accounting controls or auditing, banking and financial crime or bribery.
- Any issues or concerns relating other matters that could affect Capgemini should be reported directly to your manager or to a representative of the HR, Ethics, or Legal Departments.

France

- Concerns can only be reported relating to financial, accounting, auditing, competition law and bribery matters, harassment and discrimination in the workplace, protection of health, hygiene, and security in the workplace, and protection of the environment.
- Any issues or concerns relating other matters that could affect Capgemini should be reported directly to your manager or to a representative of the HR, Ethics, or Legal Departments.

Hungary

Any issues can only be reported directly to your manager or to HR of Capgemini Hungary Ltd.

Luxembourg

- Anonymous reports are not permitted under the law.

Morocco

- Concerns can only be reported relating to competition law, conflict of interests, insider trading, theft, fraud, assets misappropriation, irregularities in accounting, auditing or banking matters, improper financial reporting, bribery, sexual harassment, and discrimination.
- Any issues or concerns relating other matters that could affect Capgemini should be reported directly to your manager or to a representative of the HR, Ethics, or Legal Departments.

Netherlands

- Reports must relate to violation of laws, danger to public health, the safety of persons or the environment or a threat to proper performance of the organization as a result of inappropriate acts or omissions.
- Concerns can only be reported relating to abuses within the organization you are working or with which you are in contact during the course of your work.
- Anonymous reports are only allowed in exceptional cases.

Portugal

- Concerns can only be reported relating to bribery, financial, accounting and auditing matters.
- Any issues or concerns relating other matters that could affect Capgemini should be reported directly to your manager or to a representative of the HR, Ethics, or Legal Departments.
- Anonymous reports are not permitted under the law; however, your personal information will be treated confidentially.
- Additionally, only employees in key or management functions may be reported upon.

Romania

Reports can only be made relating to

- possible irregularities in
 - unfair Competition;
 - Bribery or Corruption within the business of Capgemini;
 - Conflicts of interest;
 - Insider Trading;
 - The commission of a Criminal offence;
- serious cases of
 - Accounting, Auditing or Banking matters; or
 - Vital Company Interests being affected;
- in case of a serious threat to the health or safety of any team member; or
- Harassment or discrimination.

The Speak-Up line is not intended for grievances, being general issues about any team member's personal employment situation or about private matters of other team members.

Russia

- As part of a report it is not permitted to disclose the name of individuals, that are citizens of the Russian Federation. This also includes indirect references to individuals with Russian citizenship without using explicitly its name (e.g.; "... *the top manager of our XYZ department...*")

Slovak Republic

Reports can only be made relating to

- possible irregularities in
 - unfair Competition;
 - Bribery or Corruption within the business of Capgemini;
 - Conflicts of interest;
 - Insider Trading;
 - The commission of a Criminal offence;
- serious cases of
 - Accounting, Auditing or Banking matters; or
 - Vital Company Interests being affected;
- in case of a serious threat to the health or safety of any team member; or
- Harassment or discrimination.

The Speak-Up line is not intended for grievances, being general issues about any team member's personal employment situation or about private matters of other team members.

Spain

- Concerns can only be reported relating to substantial breach of laws or severe violations of Capgemini Code of Business Ethics and policies, e.g., bribery, financial, accounting and auditing matters.
- Any issues or concerns relating other matters that could affect Capgemini should be reported directly to your manager or to a representative of the HR, Ethics, or Legal Departments.

- Anonymous reports are not permitted under the law; however, your personal information will be treated confidentially.

Sweden

- Concerns can only be reported with respect to serious irregularities relating to financial, accounting, internal accounting controls, auditing, bribery and banking and financial crime matters as well as other serious misconduct/infractions of impacting the vital interests of the company or threats to a person's health or life.
- Any issues or concerns relating other matters that could affect Capgemini should be reported directly to your manager or to a representative of the HR, Ethics, or Legal Departments.
- Additionally, only employees in key, management or leading functions may be reported upon.

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