

# **Privacy Statement for Immersive Events & Platform**

### Introduction

NTT DATA, Inc. and its affiliates (collectively 'NTT DATA', 'us', 'we', 'our') are committed to respecting and protecting your personal data (including 'personal information' or 'personally identifiable information' as defined under applicable data protection laws and regulations) and ensuring your rights as a data subject through our compliance with the practices described in this Privacy Statement.

This Privacy Statement describes our practices for collecting, using, disclosing, sharing and disposing (collectively 'processing' or 'process') of the personal data we process about you and your choices and rights in relation to your personal data when attending immersive, interactive, online or virtual events hosted by NTT DATA ('the Event') or engaging on the event management platform ('Platform').

By attending the Event or engaging on the Platform, you agree to the practices described in this Privacy Statement.

### The Event and Platform

The Event is an immersive and interactive online virtual event hosted on the Platform operated by vFairs LLC.

# Personal data that we collect about you

When you attend the Event or use the Platform, your personal data may be processed.

#### Personal data that we collect from other sources

Your first name, last name, and work email address.

#### Personal data that we collect directly from you

- Personal data contained in any content submissions or online chats submitted by you, which may include your preferences, interests and any other information you voluntarily share.
- Personal data contained in any profile you create within the Platform, which may include your name, role, organization, interests, goals, and availability.
- Personal data contained in any feedback, ratings or preferences collected from you on your satisfaction and engagement with the Event and Platform.

#### Personal data that we automatically collect

- Anonymous information, such as Events attended, and time attending the Event or Platform. We do this in order to understand what the Event and Platform engagement is like.
- We may collect certain information by automated means, such as cookies and web beacons, as described in more detail below. The information we may collect by automated means includes, but is not limited to:
  - Information about the devices used to access the Event and Platform (such as the IP address and the device, browser and operating system type).
  - Pages and URLs that refer visitors to the Event or Platform, also pages and URLs that you exit to once you leave the Event or Platform.
  - Dates and times of visits to the Platform.
  - o Information on actions taken on the Platform (such as page views, site navigation patterns, application activity, chat submission, downloading content).
  - A general geographic location (such as country and city) from which you access the Event or Platform.
  - o Search terms that you use to reach the Platform.



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We do not process sensitive personal data about you, e.g. information relating to your health, biometric or genetic information, religion, political beliefs, union membership, race or sexual orientation and ask that you do not submit or provide this information to us when participating in the Event.

We do not knowingly process information about children without appropriate parental or guardian consent and ask that you do not submit or provide this information to us when participating in the Event.

# How we process your personal data

We process your personal data in compliance with applicable data protection laws and regulations and Works Council Agreements (where applicable), based on the country in which you are employed.

We process your personal data for the following purposes:

- To authenticate you and to provide you access to the Event and Platform.
- To enable us to respond to any content submissions or online chats you submit during the Event or on the Platform.
- To create a competitive environment where certain employees may be recognised and rewarded for their participation and engagement on the Platform. You are able to opt-out of any such recognition and reward.
- To enable us to match you with suitable employees for networking, where you have opted in for networking. You will be matched based on the profile you have created on the Platform.
- To collect your feedback, ratings, and preferences during and after the Event to evaluate your satisfaction and engagement with the Event and to improve our future events. We may also use your feedback, ratings, and preferences to conduct employee surveys and research on the impact of the Event. We will only use your feedback, ratings, and preferences for employee surveys and research in accordance with our internal policies. Your participation in employee surveys and research is voluntary and will not affect your employment status, rights, or benefits.
- To compile statistical data about the Event and Platform.
- To analyse the performance and usability of the Platform.
- To measure traffic patterns for the Event and Platform
- To determine which areas of the Platform have been visited.

### How we use automated decision-making

When participating in the Event or engaging on the Platform, no automated decisions, including profiling, will be made that have any legal or significant effects on you.

# Our legal basis for processing your personal data

When we process your personal data, we rely on the following legal basis:

• Our legitimate business interests: To protect our legitimate business interests to communicate and engage with our employees on company or work-related news, announcements, developments, etc. Whenever we rely on this lawful basis to process your personal data, we assess our business interests to ensure that they do not override your rights. Additionally, you may have the right to object to our processing of your personal data in certain circumstances. See 'Your Privacy Rights' section of this Privacy Statement.



### How we disclose your personal data

We may disclose your personal data to the following parties:

- Our subsidiaries, affiliates and other NTT DATA companies: We may disclose information
  about you with our subsidiaries and affiliated entities for the purposes of operating our business,
  delivering, analyzing, improving, securing, and customizing the Event, and for other legitimate
  purposes permitted by applicable law or otherwise with your consent.
- Authorized personnel and advisors: We may disclose information about you with authorized NTT DATA personnel, agents and professional advisors to support business operations and activities.
- Authorized service providers and third parties: We may disclose information about you with our service providers or other third parties for service delivery purposes.
- Other NTT DATA employees: We may disclose information about you with other participants in the Event or users of the Platform for the purposes set out in this Privacy Statement.

We do not sell or share personal data of employees as defined by the California Privacy Rights Act.

Any service providers, third parties or other parties with whom we disclose personal data are contractually not permitted to use personal data for any purpose other than the purpose for which the personal data is provided or given access to.

### **Cross-border transfers**

As a global company operating in over 50 countries worldwide, we may transfer your personal data to countries where we do business or to international organizations in connection with the purposes identified above and in accordance with this Privacy Statement.

When we transfer your personal data from the country from where it was originally collected to another country, we take steps to ensure that appropriate safeguards are in place, in line with applicable law, to protect your personal data. You may obtain a copy of these safeguards by contacting us in accordance with the 'How to contact us' section below.

### Security of your personal data

The security of your personal data is very important to us. We are committed to protecting your personal data from accidental or unlawful destruction, loss, alteration, unauthorized access or disclosure by using a combination of physical, administrative and technical safeguards ourselves and contractually requiring third parties, service providers, and other external parties to whom we disclose your personal data to do the same.

The safety and security of your personal data also depends on you. You are responsible for keeping your username and password that you use to access the Event confidential.

# Your privacy rights

You have the right to obtain information about and access the personal data that we hold about you, and the right to request the rectification, erasure, restriction of processing or portability of that personal data. Furthermore, you have the right to object to processing of your personal data and withdraw consent. You further have the right to make a complaint or raise a concern about how we process your personal data and the right not to be discriminated against for exercising your privacy rights.

You may submit a request to enforce your rights at any time.

You can make a request regarding your privacy rights by contacting us via one of the methods provided in the 'How to contact us' section of this Privacy Statement.



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In some situations, we may not be required to enforce these rights, where permitted under applicable law and where exceptions may apply. We may also have a legitimate business interest to decline your request to action your rights.

We will retain correspondence, documents and information related to any requests or complaints for a period of 24 months or as required by any applicable laws and regulations. Individuals may hold additional rights under any local laws and regulations in certain countries, which we will recognize and uphold.

# **Authorized agent information**

You may designate an authorized agent to make a request on your behalf. When your authorized agent makes a request related to your Personal Data, we will require the agent to provide written permission from you. We may also require that you verify your own identity directly with us at the time such a request is made.

In order to allow an authorized agent to make a request on your behalf, you may contact us via one of the methods provided in the 'How to contact us' section of this Privacy Statement.

# Retaining your personal data

We retain your personal data for as long as is reasonably necessary and proportionate to fulfil the purpose for which it was collected, processed, or for another disclosed purpose, unless a longer retention period is required to comply with legal obligations, resolve disputes, protect our assets, or enforce our rights.

In some instances, we may anonymize your information in accordance with our policies and may keep those anonymized records for longer periods.

# Links to third party websites and applications

We may provide links to the websites of other parties. Some of the content, advertising, and functionality of the Platform may be provided via other parties that are not affiliated with us.

We are not responsible for and make no representations or warranties in relation to the security, privacy practices and content of these websites. Please ensure that you read the applicable privacy and cookies policies before sharing Personal Data on these sites. Your use of such websites is at your own risk.

### Changes or updates to this Privacy Statement

We may update this Privacy Statement at any time for any reason. If we do, we will update the 'Version' and 'Date'. All material changes will be communicated to you. We encourage you to regularly review this Privacy Statement to stay informed about how we use your personal data.

#### How to contact us

If you have any questions about how we use your personal data, have a privacy concern, or wish to make a request or complaint relating to your personal data, contact us via one of the following:

- Webform: Click here to access our privacy rights webform
- Email Address: privacyoffice@global.ntt
- Phone Number (US): 1-888-914-9661 Access code: 111342