

Translations

- [Chinese \(Simplified\)](#)
- [English](#)
- [French \(Canada\)](#)
- [French \(France\)](#)
- [German](#)
- [Japanese](#)
- [Portuguese](#)
- [Spanish \(Latin America\)](#)

Key Definitions

Can be found [here](#):

Related Policies and Processes

- [Code of Ethics](#)
- [Privacy and Acceptable Use Microlearning](#)
- [Cognizant Information Security Response Plan](#)
- [Record Retention Policy](#)
- [Whistleblower and Non-Retaliation Policy](#)

Scope

This policy applies to all directors, officers, and employees of all Cognizant entities, subsidiaries, and joint ventures over which Cognizant has operational control (collectively “Associates”).

At Cognizant, we respect personal privacy. We are committed to handling Personal Information in a lawful and ethical manner consistent with our [Code of Ethics](#) and this Policy. The standards described in this Policy are the worldwide standards when handling Personal Information, whether in our own right or on behalf of our customers. Where we handle Personal Information on behalf of a customer as part of service delivery (“Customer Personal Information”), we must follow the customer’s instructions, our contractual obligations and reasonably assist the customer in complying with their obligations under applicable data protection laws. This policy applies regardless of the origin of the Personal Information, the country in which we handle Personal Information, or the country in which the relevant customer is located.

Guiding Principles

Our global privacy principles are the core principles that apply when collecting, storing or otherwise handling Personal Information in any way. All Associates must understand and comply with these guiding principles when handling Personal Information. Each Privacy principle listed below contains a description of the corresponding requirements:

We comply with applicable data protection laws (“[Lawfulness](#)”).

- We comply with applicable data protection laws and this Policy.
- We take additional care when handling Sensitive Personal Information.
- We cooperate with and reasonably assist our customers to comply with their obligations under applicable data protection laws in relation to Customer Personal Information.

We are fair and transparent (“[Fairness and transparency](#)”).

- We provide notice to individuals about how we handle their Personal Information.
- We enable individuals to exercise their data protection rights under applicable data protection laws.
- Where required by applicable data protection laws, we allow recipients to opt-out of receiving marketing information.
- We do not make important decisions solely based on automated decision-making technology, except where permitted by applicable data protection laws.
- We reasonably assist our customers to enable individuals to exercise their data protection rights under applicable data protection laws and in line with our contractual obligations.

We use Personal Information for specified, explicit and legitimate purposes (“Purpose limitation”).

- We only use Personal Information for specified, explicit and legitimate purposes. We do not handle Personal Information in a manner that is incompatible with those purposes.
- We only handle Customer Personal Information in accordance with the instructions of the customer.

We handle Personal Information that is adequate, relevant and necessary (“Data minimization”).

- We only handle Personal Information that is necessary for the required purposes and we have appropriate controls and security measures in place to ensure that this is the default setting (“Privacy by Default”).
- When designing and implementing new products and systems, we implement appropriate controls and security measures to ensure compliance with our Global Privacy Principles (“Privacy by Design”).
- We provide our services in a way that supports our customers to implement Privacy by Design and Privacy by Default in relation to Customer Personal Information, in line with applicable data protection laws and our contractual obligations.

We handle Personal Information that is accurate and kept up to date (“Accuracy”).

- We ensure that we erase or rectify inaccurate Personal Information without undue delay.
- Where applicable, we assist our customers to erase or rectify inaccurate Customer Personal Information, in line with applicable data protection laws and our contractual obligations.

We retain Personal Information only for as long as is necessary (“Storage limitation”).

- We keep Personal Information only for as long as is necessary for the purposes for which it was collected or as required by applicable laws or regulations. We securely dispose of such Personal Information in accordance with applicable data protection laws.
- Where applicable, we assist our customers in the secure deletion or return of Customer Personal Information, in line with applicable data protection legislation and our contractual obligations.

We take appropriate security measures (“Security, integrity and confidentiality”).

- We take appropriate security measures to protect Personal Information.
- We appropriately classify and label systems that are storing, processing and transmitting Personal Information.
- We follow our security incident reporting processes and report data incidents promptly in line with applicable procedures and applicable data protection laws.
- We ensure that any service providers we appoint to handle Personal Information on our behalf take appropriate security measures. We impose contractual terms on service providers to protect Personal Information in accordance with applicable data protection laws.
- We do not transfer Personal Information internationally without first ensuring appropriate protection for Personal Information, in accordance with applicable data protection laws.
- We cooperate with and reasonably assist our customers to take appropriate security measures in relation to Customer Personal Information, in line with applicable data protection laws and our contractual obligations.
- In relation to Customer Personal Information, we comply with the security incident reporting requirements that exist under applicable data protection laws and our customer contracts.
- In line with applicable data protection laws and our contractual obligations, we only appoint service providers to handle Customer Personal Information with authorization from our customer and in accordance with the customer’s requirements.

- We follow the instructions of our customers concerning all transfers of Customer Personal Information.

We can demonstrate our compliance with our Global Privacy Principles (“Accountability”).

- We carry out Privacy Impact Assessments where our use of Personal Information is likely to result in a risk to individuals and consult with data protection authorities where required by applicable data protection laws.
- Where required by applicable data protection laws, we maintain records of the Personal Information we handle and make these records available to data protection authorities upon request.
- We assist customers to comply with this requirement in relation to Customer Personal Information, in line with applicable data protection laws and our contractual obligations.

If you have questions about this policy and your obligations under it, please reach out to the Global Privacy Team (privacy@cognizant.com).

Disciplinary Consequences

Subject to local laws and regulations, a violation of this policy could result in disciplinary action, up to and including termination. If you are aware of a violation of this policy, you have an obligation to report it to the Company. As stated in Cognizant’s [Whistleblower and Non-Retaliation Policy](#), Cognizant does not tolerate retaliation against any individual who submits a good faith report of a violation or possible violation of law, the Code of Ethics, or other Cognizant policies.

To report a possible violation of this policy, visit Cognizant’s Ethics & Compliance Helpline (a secure and confidential reporting system) at: www.cognizant.com/compliance-helpline.

Version History

Revision Date	Description of Change
Jan-25-2017	Initial release
Sep-01-2019	Update to incorporate global privacy principles including global privacy requirements and using the template for Cognizant corporate policies.

Policy Control Information

Policy Name: Global Privacy Policy

Department: Ethics & Compliance

Revision Date: Sept-01-2019

Effective Date: Jan-25-2017

Policy Owner: [Stephanie Higgins](#), Chief Privacy and Data Ethics Officer