

## Introduction

Fidelity National Information Services Inc. and certain members of the FIS group of companies (collectively, “FIS”), have adopted a comprehensive program to safeguard and protect the personal data it processes relating to identified or identifiable individual persons with whom, or representing other companies with whom, the FIS Group has or seeks to have business relationships in support of the business of the FIS Group (“FIS Controlled Personal Data”).

This Notice does not apply to personal data relating to employees, applicants for employment and temporary contractors providing services to FIS, or others in relationships with such persons that are relevant to their relationship with FIS (such as for global mobility, emergency contact, and benefits purposes). For information regarding FIS processing of such data, see the FIS Staff Privacy Notice.

In the normal course of business activities, FIS provides services for clients that result in FIS processing personal data on behalf of those clients. In many cases FIS acts as a data processor on behalf of the client who is the data controller of certain personal data provided to FIS for processing by FIS on behalf of the client. This Notice does not apply to such processing. The processing of such personal data on behalf of clients will be carried out by FIS in accordance with the terms of the relevant contract or contracts between FIS and the client that provides the personal data to FIS for processing.

For additional information, see also the [FIS Privacy Policy](#).

The term “processing” is used in this Notice to cover all activities involving FIS Controlled Personal Data, including collecting, handling, updating, storing, deleting, sharing, accessing, using, transferring, and disposing of the FIS Controlled Personal Data. “Personal data” means any information that relates to an individual person that is collected and processed in the context of the individual’s working relationship with FIS, and the “data subject” of the personal data is the person that the information relates to. The term “controller” as used in this Notice describes the situation in which FIS is in the position to determine how and why the personal data is processed.

The controller for Controlled Personal Data is the FIS company to which the data subject or the employer of the data subject has provided the personal data.

## Description of Data Processing

This Notice is directed to those persons who are the data subject of FIS Controlled Personal Data. The subject of this Notice is personal data controlled and processed by FIS related to the collection of accounts receivable, the processing of accounts payable, sales, marketing, and vendor and customer relationship management purposes. In some cases, FIS also uses Controlled Personal Data for sanctions and anti-money laundering screening and to meet regulatory requirements.

The FIS Controlled Personal Data may have been provided to FIS directly by the person to whom it relates, or by another person or company, such as the vendor or customer that employs the subject of the data and with whom FIS has a business relationship. For the purposes of “know your customer” and other regulatory requirements, personal data may be screened against third-party identification services and government-provided databases, which return information regarding potential matches to publicly available information.

We do carry out some automated decision making such as credit and fraud checks. We may be unable to provide you with our services if you do not pass these checks.

For more detailed information on the categories of data processed, the purposes of processing and the legal basis on which FIS relies to process Controller Personal Data, please consult the Appendix to this Notice.

## International Transfers and Third Parties

In the ordinary course of global business operations, FIS needs to make international transfers of FIS Controlled Personal Data between its various branches and offices and selected service providers in many parts of the world. Some of the countries to which the data is transferred may not have equivalent privacy and data protection laws to those in the data subject's country of residence.

FIS has established a data protection program and has put in place data processing agreements (based on European Commission-approved model contracts) to ensure that adequate safeguards are in place for the processing and transfer of such FIS Controlled Personal Data in order to protect the interests of the relevant subjects of the FIS Controlled Personal Data as well as the commercial interests of FIS.

In support of FIS global operations, FIS may need to make FIS Controlled Personal Data available to selected external third-party service providers performing services at the request of FIS. Examples of third party service providers with whom the data could be shared include legal advisors and information technology service providers. Such third parties may be located in countries that may not have the same privacy /data protection laws and regulations as the home country of the data subject of the FIS Controlled Personal Data. FIS ensures that transfers of FIS Controlled Personal Data among FIS group companies and third parties are subject to appropriate safeguards, including through the use of European Commission-approved model clauses and other appropriate data transfer arrangements.

## Security

FIS is committed to the confidentiality and security of the FIS Controlled Personal Data. FIS' systems and facilities in which the FIS Controlled Personal Data are processed are protected by secure network architectures that contain firewalls and intrusion detection devices. Access to the FIS Controlled Personal Data is limited to those individuals who need the information to perform their job duties. These people have unique identifying codes and passwords that must be used to access the systems and facilities that hold FIS Controlled Personal Data.

## Choices and Rights

The subjects of FIS Controlled Personal Data may request further details regarding FIS' processing of their FIS Controlled Personal Data in accordance with local applicable law. Further, such data subjects are entitled in certain circumstances to review their personal data controlled by FIS and to request appropriate rectification, erasure, portability or blocking of their personal data. In addition, where applicable, data subjects have the right to object to processing based on legitimate interests and to withdraw consent where consent forms the legal basis for processing. These rights may be limited, for example, if fulfilling a request would reveal personal data about another person, or if the processing is required by law or another compelling legitimate interest. Subject to applicable law, data subjects may have the right to complain to a data protection authority.

It is the responsibility of the person subject to the FIS Controlled Personal Data to request such benefits by contacting the FIS [Privacy Office](#).

FIS will retain Controlled Personal Data only for as long as needed for FIS' legitimate interests or it is otherwise being processed in accordance with applicable law, to perform a requested service, or to meet a legal requirement. Subsequently FIS will take steps to delete the personal data or hold it in a form that no longer identifies the individual.

## Changes to this Notice

As this Notice is updated or modified, the current version will be posted, and any material changes from previous versions highlighted, on the Corporate Governance section of [fisglobal.com](http://fisglobal.com).

## Contact Us

The purpose of this Notice is to provide data subjects of the FIS Controlled Personal Data appropriate details regarding the specific FIS Controlled Personal Data that may be processed by FIS, and how FIS collects and uses such FIS Controlled Personal Data. We encourage data subjects of such FIS Controlled Personal Data to read this Notice (including the Appendix) carefully and understand the contents. If you are a data subject of such FIS Controlled Personal Data and have any questions relating to FIS processing of personal data about you, you should send your inquiries to

**Chief Privacy Officer**

FIS

601 Riverside Avenue

Jacksonville, FL 32204

[privacyoffice@fisglobal.com](mailto:privacyoffice@fisglobal.com)

If you are based in the European Economic Area (EEA) or Switzerland, you may contact our Data Protection Officer at the following address:

**Data Protection Officer**

FIS

25 Canada Square, Canary Wharf

London E14 5LQ

United Kingdom

[privacyoffice@fisglobal.com](mailto:privacyoffice@fisglobal.com)

## APPENDIX

### Description and Uses of FIS Controlled Personal Data that is not Staff Personal Data

#### Purposes of the Processing

With respect to data subjects whose personal data is processed by FIS as FIS Controlled Personal Data, for example, related to the collection of accounts receivable, the processing of accounts payable, sales, marketing, vendor and customer relationship management purposes, the personal data may be transferred and processed for the following purposes:

| Purpose of processing   |   | Legal ground(s) for use   |
|---|---|---|
| Designing, evaluating, benchmarking and administering:        | FIS product and service offerings and their fitness to purpose for particular clients.                | FIS relies on: <ul style="list-style-type: none"> <li>• Consent to collect any information provided directly and to send promotional material;</li> <li>• Its legitimate interests in protecting its rights;</li> <li>• FIS's legitimate interests in developing and improving products and services; and</li> <li>• The need to process personal data in order to provide a requested product or service.</li> </ul> |
|   | Diversity programs, including compliance with diversity objectives                                    |   |
|   | FIS controlled recognition and rewards programs   |   |
|   | Education, training and awareness programs  |   |
|   | Sales and marketing campaigns   |   |
|   | Offers of products and services and contracting   |   |
|   | Accounts receivable; Accounts payable; Bad debt and reserves; bank accounts for payments and receipts |   |
| Assembling, maintaining and disseminating:                    | Job assignments for sales, marketing and collections  | FIS relies on: <ul style="list-style-type: none"> <li>• Its legitimate interests in the administration of its business</li> </ul>   |
|   | Company directories   |   |
|   | Emergency contact information   |   |
|   | Identification credentials  |   |
| Supporting, monitoring, auditing, executing and facilitating: | Business conferences and travel   | FIS relies on: <ul style="list-style-type: none"> <li>• Consent to collect any information provided directly;</li> <li>• Its legitimate interests in the administration of its business;</li> <li>• Its legitimate interests in protecting the integrity of FIS services, facilities and systems, and staff;</li> </ul>   |
|   | Business negotiations and transactions  |   |
|   | Business operations, including staffing proposals and client billing                                  |   |
|   | Business transition activities, including mergers, acquisitions and divestitures                      |   |
|   | Company marketing efforts, including websites, conferences, brochures, and                            |   |

| Purpose of processing     |   | Legal ground(s) for use  |
|---------------------------|---|--|
|                           | <p>other promotional media events and materials</p> <p>Compliance with contractual obligations; customer service and support</p> <p>Identification for security and systems/facility authentication</p> <p>Internal and external business communications and management reporting</p> | <ul style="list-style-type: none"> <li>• Its legitimate interests in preserving records for business purposes, assuring security at its facilities and systems, and making contact information available to relevant employees;</li> <li>• FIS's legitimate interests in promoting, developing and improving products and services; and</li> <li>• The need to process personal data in order to provide a requested opportunity, product or service, or to fulfil a contract.</li> </ul>    |
| Complying with:           | Applicable laws, regulations and legal requirements, including reporting and disclosure obligations   | <p>FIS relies on:</p> <ul style="list-style-type: none"> <li>• Legal requirements to process personal data;</li> <li>• FIS' legitimate interests in conducting sanctions and anti-money laundering screening and meeting regulatory requirements;</li> <li>• Its legitimate interests in protecting its rights.</li> </ul>   |
| Conducting:               | <p>Audits and accounting, financial and economic analyses</p> <p>In accordance with local law, investigations into alleged policy or contractual violations, misconduct related to work, safety and security concerns</p> <p>Opinion and engagement surveys</p>                       | <p>FIS relies on:</p> <ul style="list-style-type: none"> <li>• Its legitimate interests in analyzing performance, understanding FIS client and customer preferences, and preserving the integrity of the FIS workplace;</li> <li>• Its legitimate interests in protecting the integrity of FIS services, operations, facilities and systems, and staff;</li> <li>• Its legitimate interests in protecting its rights; and</li> <li>• Legal requirements to process personal data.</li> </ul> |
| Protecting:               | Safety and security of personnel, workplaces and company assets, by implementation of identity authentication and other security measures, control of access to workplaces, monitoring of activity in company work locations, and execution of backup and storage procedures          | <p>FIS relies on:</p> <ul style="list-style-type: none"> <li>• Its legitimate interests in protecting its rights, the integrity of FIS services, operations, facilities and systems, and staff, and preventing fraud or the misuse of FIS services.</li> </ul>   |
| Preventing and detecting: | Crime   | <p>FIS relies on:</p> <ul style="list-style-type: none"> <li>• Its legitimate interests and legal obligations;</li> <li>• FIS' legitimate interests in conducting sanctions and anti-money laundering screening and meeting regulatory requirements; and</li> </ul>  |

| Purpose of processing  |  | Legal ground(s) for use  |
|--|--|--|
|  |  | <ul style="list-style-type: none"> <li>Its legitimate interest in protecting its rights and property.</li> </ul>   |
| Monitoring, auditing and reviewing:                          | Communications and information on company systems, including email and website usage | FIS relies on: <ul style="list-style-type: none"> <li>Its legitimate interests in protecting the integrity of FIS services; and</li> <li>Its legitimate interests in protecting its rights, the integrity of FIS services, operations, facilities and systems, and staff, and preventing fraud or the misuse of FIS services.</li> </ul> |
|  | Compliance with company policies, procedures, and processes                          |  |
|  | Activity in company work locations   |  |
| Preparing for, defending, participating in or responding to: | E-discovery requests for information   | FIS relies on: <ul style="list-style-type: none"> <li>Legal requirements to participate in legal process;</li> <li>FIS' legitimate interests in conducting sanctions and anti-money laundering screening and meeting regulatory requirements; and</li> <li>Its legitimate interests in protecting its rights</li> </ul>                  |
|  | Litigation or potential litigation and other types of dispute resolution             |  |
| Processing and administering:                                | Tax and other required withholdings  | FIS relies on: <ul style="list-style-type: none"> <li>Legal record-keeping and reporting requirements;</li> <li>Its legitimate interests in protecting its rights and</li> <li>The need to process personal data to fulfil contractual and legal obligations</li> </ul>  |
|  | Reimbursements for business travel and other reimbursable business expenses          |  |
|  | Invoices, payments, cash balances and accounting                                     |  |

### Categories of data

With respect to data subjects whose personal data is processed by FIS as FIS Controlled Personal Data, such as related to the collection of accounts receivable, the processing of accounts payable, sales, marketing, vendor and customer relationship management purposes, the FIS Controlled Personal Data processed may concern the following categories of data.

| Data Category                       | Example  |
|-------------------------------------|--|
| Advice, opinions and other comments | Engagement surveys, exit interviews.   |
| Bank and financial details          | Payment and/or expense reimbursement; direct deposit banking information; credit card information; wire clearing information; bank account number and sort codes; invoicing details and payment details. |
| Business travel and movement data   | Travel data, including travel schedules; lodging, conveyance, meals and other expenses.  |
| Grievance data                      | Complaints, tribunal data.   |

|   |  |
|---|--|
| Information recorded on or in company systems, equipment or documents | Emails; text messages; web site usage; voicemail recordings; calendar or diary entries; correspondence, including Personal Information included in or on company systems, equipment or documents by the Data Subject.          |
| Access records  | Dates, times and locations of entry and exit from controlled facilities and systems; computer and system logon/off audit trails.   |
| Organizational data   | Name, company structure, organizational charts, reporting relationships, titles, work contact details, email, accounting code details.   |
| Personal details and contact information                              | Name, gender, birth date, home and business address, phone numbers, email, government-issued identification numbers, identification numbers issued by or on behalf of the company, signatures, handwriting.                    |
| Photo, video or audio recordings                                      | Information collected by security systems, closed-circuit television; profile photographs, voice mail, recorded trainings, conferences or marketing materials.   |
| Reports of disputes, defaults or policy violations                    | Records of oral, written, email, telephone or similar reports pertaining to alleged and confirmed staff misconduct, contract issues, payment defaults, audits or violations of company policies.                               |
| Talent, education, and training details                               | Education, skills, work experience, prior employment, training, language skills, technical skills, educational background, professional certifications and registrations, membership in professional bodies and organizations. |
| Work schedule data  | Planned and actual working times.  |
| Workplace safety data   | Reports, photographs, video recordings.  |

### Sensitive data

In some jurisdictions, personal data that is considered “sensitive personal data” (or “special categories of data”) under applicable laws may be subject to more stringent protection and limitations on use than other personal data. What is considered sensitive personal data varies from country to country, but generally includes information relating to a person’s sexual orientation, racial or ethnic origin, alleged or actual criminal offense, physical or mental health or condition, trade union membership, political opinions, religious belief or genetic data. It is the intent of FIS that the FIS Controlled Personal Data will not include any personal data that would be considered sensitive personal data under the applicable laws of any jurisdiction.