

Introduction

Fidelity National Information Services, Inc. and certain members of its affiliated group of owned and controlled subsidiary companies (collectively, “**FIS**”), including the FIS company that employs or contracts with you, have adopted a comprehensive program to safeguard and protect the personal data it processes relating to identified or identifiable employees, applicants for employment and independent or licensed contractors, as well as personal data of other persons in relationships with such employees, applicants for employment and contractors that are relevant to their relationship with FIS (such as for global mobility, emergency contact, and benefits purposes as applicable) (collectively, “**Staff Personal Data**”).

The purpose of this notice is to provide you further details regarding the Staff Personal Data that may be processed by FIS and how FIS collects and uses Staff Personal Data before, during and after your employment or contract with FIS. The term “processing” is used in this notice to cover all activities involving Staff Personal Data, including collecting, handling, updating, storing, deleting, sharing, accessing, using, transferring, and disposing of the Staff Personal Data. We encourage you to read this notice (including the Appendix) carefully and understand the contents. If you have any questions relating to FIS processing of Staff Personal Data, you should contact the FIS Privacy Office using the contact information listed in the Appendix.

The primary data controller for your Staff Personal Data is the FIS company which employs you or to which you have made an application. If you have any questions about who this company is then please contact **Daimary Eldredge** in The People Office at [Daimary Eldredge](#)

Description of Data Processing

Staff Personal Data includes all personal information collected and processed in the context of an individual's working relationship with FIS. For example, FIS processes Staff Personal Data regarding job candidates, employees (whether temporary or regular), contingent workers, independent contractors, retirees, and persons formerly in such roles with FIS. FIS also processes Staff Personal Data regarding relatives, dependents or other persons in relationship with job candidates, employees, contingent workers, independent contractors, retirees and persons formerly in such roles with FIS when their personal information has been given to FIS by such persons with a working relationship with FIS. A list of the types of Staff Personal Data that may be processed is set out in the Appendix, together with the purposes of the data processing and the categories of the recipients of the data that may apply.

In some jurisdictions, Staff Personal Data that is considered “sensitive personal data” under applicable laws may need to be collected as required or permitted by local law, for example for the purposes of complying with equal opportunity measures or local tax requirements. In the attached Appendix, the relevant data categories in which sensitive personal information might be included are listed separately.

The Staff Personal Data may be provided to FIS directly by the person to whom it relates, or by another person or company. For example, if you make an application for employment or accept employment with FIS, FIS may obtain information from recruiters, employment research firms, identity verification services, the references you provide, third-party websites, including through LinkedIn, and other publicly available sources. Where permitted by local law and with your consent, FIS may request background or credit checks from public authorities or financial institutions to evaluate your eligibility for employment or for certain tasks, as well as your medical information if required to evaluate your eligibility for employment benefits. For the purposes of meeting regulatory requirements, personal

data may be screened against third-party identification services and government-provided databases which contain personal data and return results regarding potential matches to publicly available data.

Why FIS collects, uses and stores this Staff Personal Data

FIS collects, uses and stores Staff Personal Data where necessary to administer your contractual relationship with FIS, or in connection with services or opportunities which you request, where necessary to comply with a legal obligation, and where necessary pursuant to FIS' legitimate interests and where these interests are not overridden by your data protection rights. This means where we have a good legal reason to do so that does not prejudice your rights in any way. For example, FIS has a legitimate interest in ensuring the security and integrity of its facilities and systems and in ensuring that relevant information for the conduct of our business is available across the FIS group. FIS may also process your Staff Personal Data in limited circumstances where you have given consent. Where FIS asks for consent, you are free to withhold or revoke it.

For more information on FIS' legal basis for processing Staff Personal Data, please consult the Appendix.

Who do we share your data with?

As FIS operates internationally, FIS needs to make Staff Personal Data available to other FIS entities and to selected external third-party service providers, such as payroll, benefit, and pension providers as well as tax advisors and information technology service providers performing services at the request of FIS. FIS may also make Staff Personal Data available to other third parties, such as law enforcement, tax authorities, other public bodies and upon your request to marketing companies where such transfers are lawful and appropriate.

Is your data sent abroad?

Such entities and third parties may be located in countries that may not have the same privacy / data protection laws and regulations as your home country. FIS will ensure that the Staff Personal Data will remain protected as required by applicable laws, even when transferred cross border to a third party including through the use of European Commission-approved model clauses and other data transfer safeguards.

For more information on how FIS safeguards transfers of Staff Personal Data, please contact the FIS Privacy Office as provided below.

Security

FIS is committed to the confidentiality and security of the Staff Personal Data. FIS' systems in which the Staff Personal Data are processed are protected by secure network architectures that contain firewalls and intrusion detection devices. Access to the Staff Personal Data within FIS 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 that hold Staff Personal Data.

Choices and Rights

You may request further details regarding FIS' processing of your Staff Personal Data in accordance with local applicable law.

You have certain rights over your personal data including:

- A right to receive information about your data or to access your data,
- A right to erase certain data,
- A right to stop your data being processed in certain circumstances, and
- A right related to automated profiling.

There are limitations in relation to these rights. Please consult the FIS Privacy Office or your local competent data protection authorities for more details.

It is your responsibility to (1) notify your People Office Manager, and (2) correct in the FIS People Office Information System (Workday, RMSystems, Agresso) any change to either your own Staff Personal Data details or that of others in relationship with you which are relevant to your relationship with FIS (e.g. for global mobility, emergency contact, and benefits purposes) such as home address, next of kin, bank account details, etc., so that accurate employment records can be maintained.

If you are a job applicant, retiree, or other person without access to the FIS People Office Information System or a People Office Manager, such requests should be directed to the FIS Privacy Office using the contact information listed below.

Where Staff Personal Data is processed for the purposes of direct marketing, procedures will exist allowing you to “opt-out” from having your Staff Personal Data used for such marketing. This option refers to offers marketing consumer goods or FIS products or services to you, and will not permit the “opt-out” from normal and customary communications regarding the employment relationship, including employee benefits and health and wellness programs made available by FIS.

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 on the Corporate Governance section of fisglobal.com and the Corporate Compliance page of FISandMe.

Contact points for data protection enquiries:

Chief Privacy Officer
FIS
601 Riverside Avenue
Jacksonville, FL 32204
E-mail: privacyoffice@fisglobal.com

Data Protection Officer
FIS
25 Canada Square, Canary Wharf
London E14 5LQ
United Kingdom
E-mail: privacyoffice@fisglobal.com

Include your question regarding data privacy/security along with your contact details. EU individuals can contact the EU Supervisory authority if they have a complaint about how their data has been processed. Please contact the [FIS Privacy Office](#) if you unsure where to direct a complaint.

APPENDIX - Description and Uses of Staff Personal Data

Purposes of the Processing

Staff Personal Data may be processed for the following purposes:

Purpose of Processing		Legal ground(s) for use
Designing, evaluating, benchmarking, and administering:	Compensation and benefits programs, including salary, bonuses, pensions, medical benefits, insurance policies, vacation, and leaves of absence for employees and dependents	FIS relies on: <ul style="list-style-type: none"> • The need to process personal data to fulfill the employment relationship or requests for employee benefits; • FIS' legitimate interests in conducting sanctions and anti-money laundering screening and meeting regulatory requirements; • FIS' legitimate interests in developing and managing its workforce; and The explicit consent of the employee where legally required.
	Diversity programs, including compliance with diversity objectives FIS controlled recognition and rewards programs Employment-related education, training, and awareness programs	
	Global mobility programs, including the transfer, relocation and movement of employees and dependents	
	Job descriptions	
	Manpower and succession programs	
	New hire and departing staff activities and programs	
	Recruitment programs	
	Workplace safety and security measures	
Assembling, maintaining and disseminating:	Business employment records for past, present, and potential employees	FIS relies on: <ul style="list-style-type: none"> • The need to process personal data to fulfill the employment relationship; • Its legitimate interests in preserving records for business purposes, assuring security at its facilities and systems, and making contact information available to relevant employees; and • The consent of the employee where legally required.
	Company directories	
	Emergency contact information	
	Identification credentials	

Purpose of Processing		Legal ground(s) for use
Supporting, executing, and facilitating:	Business conferences and travel	FIS relies on: <ul style="list-style-type: none"> • The need to process personal data to fulfill the employment relationship or requests for employee benefits; • FIS’ legitimate interests in developing and managing its workforce; • FIS’ legitimate interests in promoting and delivering its products and services, developing business opportunities, and maintaining the security and integrity of its facilities, systems and IT infrastructure; and • The consent of the employee, where legally required.
	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, business cards and other promotional media events and materials	
	Compliance with contractual obligations	
	Identification for security and systems authentication	
	Internal and external business communications, including email	
Complying with:	Applicable laws, regulations, and legal requirements, including reporting and disclosure obligations and tax filings	FIS relies on: <ul style="list-style-type: none"> • Legal record-keeping and reporting requirements; • FIS’ legitimate interests in conducting sanctions and anti-money laundering screening and meeting regulatory requirements; • The need to process personal data to fulfill the employment relationship or requests for employee benefits; • FIS’ legitimate interests in developing and managing its workforce; • FIS’ legitimate interests in promoting and delivering its products and services, developing business opportunities, and maintaining the security and integrity of its facilities, systems and IT infrastructure; and • The consent of the employee where legally required.

Purpose of Processing		Legal ground(s) for use
Conducting:	Audits and accounting, financial and economic analyses	FIS relies on: <ul style="list-style-type: none"> FIS' legitimate interests in developing and managing its workforce; FIS' legitimate interests in conducting sanctions and anti-money laundering screening and meeting regulatory requirements; The need to process personal data to fulfill the employment relationship or requests for employee benefits; Its legitimate interests in preserving the integrity of the FIS workplace and understanding employee preferences; and The consent of the employee where legally required.
	In accordance with local law, workplace investigations into alleged policy violations, misconduct related to work, safety, and security concerns	
	Opinion and engagement surveys	
Considering and evaluating:	Applicants for employment or engagement	FIS relies on: <ul style="list-style-type: none"> The need to process personal data for evaluation and tracking absences as an integral component of the employment relationship; The need to process personal data to fulfill the employment relationship or requests for employee benefits; Its legitimate interests in managing its workforce and hiring appropriate personnel; Its legitimate interests in analyzing performance and providing adequate compensation; The explicit consent of the employee where legally required; and Its legitimate interest to satisfy legal requirements and to provide reasonable accommodations and assess fitness for duty.
	FIS controlled conduct, job performance and attendance, including for the purposes of performance appraisals, compensation decision-making, promotion, transfer, redeployment, and termination	
	Leaves of absence	
	Requests for reasonable accommodations, fitness for duty	
Maintaining and improving:	Workplace and staff health	FIS relies on: <ul style="list-style-type: none"> Its legitimate interests in promoting and improving health, safety, security and performance; FIS' legitimate interests in promoting and delivering its products and services, developing business opportunities, and maintaining the security and integrity of its facilities, systems and IT infrastructure; Legal requirements to provide a safe and healthy work environment; and
	Workplace and staff safety and security	
	Workplace operations and performance	

Purpose of Processing		Legal ground(s) for use
		<ul style="list-style-type: none"> Explicit consent, where legally required.
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	FIS relies on: <ul style="list-style-type: none"> FIS' legitimate interests in promoting and delivering its products and services, developing business opportunities, and maintaining the security and integrity of its facilities, systems and IT infrastructure; Its legitimate interests in protecting the safety and security of staff, systems and facilities; and Explicit consent, where legally required.
Preventing and detecting:	Crime	FIS relies on: <ul style="list-style-type: none"> Its legitimate interests and legal obligations; FIS' legitimate interests in conducting sanctions and anti-money laundering screening and meeting regulatory requirements; Its legitimate interest in protecting its rights and property; Its legitimate interests in managing its workforce and hiring and retaining appropriate personnel; and Explicit consent, where legally required.
Monitoring and reviewing:	Communications and information on Company systems, including email and website usage, in connection with workplace investigations into alleged policy violations, misconduct related to work, safety, and security concerns	FIS relies on: <ul style="list-style-type: none"> Its legitimate interests in protecting the integrity of FIS services, facilities, systems and staff; FIS' legitimate interests in developing and managing its workforce; and Explicit consent where legally required.
	Compliance with company policies, procedures, and processes	
	FIS controlled attendance	
	Activity in FIS work locations	
Preparing for, defending, participating in, or responding to:	E-discovery requests for information	FIS relies on: <ul style="list-style-type: none"> Legal requirements to participate in legal process; FIS' legitimate interests in conducting sanctions and anti-money laundering
	Litigation or potential litigation	

Purpose of Processing		Legal ground(s) for use
		screening and meeting regulatory requirements; <ul style="list-style-type: none"> • Its legitimate interests in protecting its rights; and • Explicit consent where legally required.
Processing and administering:	Payroll, tax, and other required withholdings (such as court-ordered garnishments)	FIS relies on: <ul style="list-style-type: none"> • The need to process personal data to fulfill the employment relationship or requests made by the employee; • Legal requirements to participate in legal process; and • Explicit consent where legally required.
	Reimbursements for business travel and other reimbursable business expenses	

Categories of Data

Staff Personal Data processed concern the following categories of data:

Data Category	Examples
Advice, opinions, and other comments	Engagement surveys, exit interviews.
Attendance data	Work absences, leave entitlements and requests, attendance records, paid and unpaid leave records.
Bank and financial details	Payroll and/or expense reimbursement direct deposit banking information, credit card information.
Benefit data	Insurance, powers of attorney, benefit plans records for employees and/or dependents enrolled in, benefit continuation records.
Business travel and movement data	Travel data, including travel schedules; lodging, conveyance, meals, and other expenses.
Company property issuance data	Records of Company-issued assets, equipment, and vehicles.
Compensation data	Base salary, bonus, and other compensation elements, pay type, pay grade, pay level, full time equivalent (FTE), currency, compensation requests (past and current); employment terms.
Dependent information	Personal contact and identity data on dependents and significant others.
Disciplinary data	Warnings; letters of reprimand; written and oral counselling.
Grievance data	Complaints, tribunal data.

Data Category	Examples
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 Data included in or on company systems, equipment or documents by employees or independent contractors.
Key card and access records	Dates, times, and locations of entry and exit from controlled facilities; computer and system logon/off audit trails.
Military status	Branch of service; rank; dates of enlistment or discharge; discharge status; disabled veteran status; awards or medals granted; protected veteran status.
Organizational data	Name, company structure, organizational charts, reporting relationships, titles, work contact details, email, accounting code details; employment terms, job descriptions and salary levels
Payroll processing data	Name, government-issued ID, home address, email, time attendance, remuneration, compensation data, hire date, termination date, employment terms, dependents data, bank and financial data, benefit data, accounting code details, withholdings and deductions and benefit enrolments with employee contribution.
Performance and employment	Performance assessments, performance counselling, letters of appreciation, details performance complaints.
Personal details and contact information	Name, gender, birth date, place of birth, home 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.
Recruiting and application data	Application details, applicant testing results.
Reports of misconduct or policy violations	Records of oral, written, email, telephone or Ethics Portal, Ethics Hotline, FSIRT, SIRI-P and similar reports pertaining to alleged and confirmed staff misconduct or violations of company policies.
Right to work / immigration data	Right to work documents; nationality, residency, citizenship, passport, and visa information.
Talent, education, and training details	Education, skills, work experience, prior employment, accomplishments, projects, development and training, language skills, technical skills, educational background, professional certifications and registrations, membership in professional bodies and organizations.

Data Category	Examples
Work history	Dates of hire and/or termination; title; dates of promotion, training courses attended, acknowledgement of company policies, reason for resignation or termination, public offices held, publications.
Work schedule data	Planned and actual working times, billable and administrative time records; employment terms.
Workplace safety data	Reports, photographs, video recordings.

Sensitive Data (if appropriate)

In some jurisdictions, Staff Personal Data that is considered “sensitive personal data” under applicable laws may need to be collected as permitted or required by local law, for example for the purposes of equal opportunity measures or tax purposes. What is considered sensitive personal information 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. Please note that this does not mean that all the listed examples of sensitive personal information will be processed for every employee, but only insofar as deemed necessary for the purposes of the legitimate interests pursued by FIS from time to time and always in compliance with local applicable laws and practice. Applicable local law may in some circumstances require the data subject’s consent to process sensitive personal data.

Staff Personal Data processed may concern the following categories of sensitive data:

Sensitive Data Category	Examples
Data revealing offenses, criminal convictions or information deriving from security measures	Criminal proceedings, outcomes, and sentences; driving history, prior employment, substance abuse screening; court records and background check information.
Data revealing sex life	Personal contact and identity data on dependents and significant others; marital/partnership status, accommodation, and housing information
Data revealing personal credit and financial information	Credit check, child support, debt payments.
Data revealing physical or mental health or condition	Physical limitations and special needs; on-site screenings; company referrals for medical or counselling support; substance abuse testing; health certifications.
Data revealing racial or ethnic origin	Racial designations, nationality, cultural identity.

Sensitive Data Category	Examples
Data revealing religious affiliation or beliefs or other beliefs of a similar nature	Affiliation with religious organizations, declaration of religious preference.
Data revealing trade union membership	Union or works council records, directories, meeting documentation and other materials
Data revealing political opinions	Professional and other affiliations, offices held, publications and writings

Recipients

The Staff Personal Data processed may be disclosed to the following recipients or categories of recipients: FIS People Office, Legal, Compliance, Risk Management, Audit, Finance and Accounting, Security, Information Systems, members of the Board of Directors, management personnel, and FIS-selected service providers and other third parties.

Storage limits and other relevant information

Staff Personal Data will be retained for as long as there is a business need or as required by law and regulation. More information on FIS' data retention standards may be found in the Record Management Policy found in the FIS Enterprise Policy Office on [FISandMe](#). Consult your local FIS Legal Department for specific records retention policies for your country. If you are a job applicant, retiree or other person without access to FIS systems to review such policies, requests for such information should be directed to the FIS Privacy Office.