

Data Protection White Paper for Customers

Data Protection is a vital compliance topic for the management board and all NTT DATA Business Solutions' employees. The company has invested significant time and resources to develop processes that enable it to be fully compliant with current data protection legislation, especially the effective management of data breaches and the processing of personal data. Examples of personal data are names, addresses, phone numbers and email addresses.

It has created awareness amongst its employees by effectively communicating its Data Protection Policy as a fundamental activity for new starters and existing employees. Observing the Data Protection Policy is mandatory for all employees to ensure the integrity and legal compliance for all of our services. Terms in every employment contract require any employee who processes personal data to be bound by the Data Protection Policy. The company supports this approach with comprehensive training, which is mandatory for everyone.

The combination of effective processes, clear communication and comprehensive employee training gives the company a strong foundation for data protection compliance.

The European General Data Protection Regulation forms the legal basis for the current strategy of the Data Protection Management System. However, as a result of its vision, newly emerging Data Protection laws including PIPL, CCPA and LGPD are consistently considered for future enhancements of the strategy here at NTT DATA Business Solutions. We aim to ensure timely compliance with the rising level of Data Protection requirements applicable to the delivery of our products globally.

The company has appointed a Corporate Data Protection Officer who has established a global team to provide support. The global team ensures the implementation of data protection measures at all NTT DATA Business Solutions' global locations consistently, taking into account local legislation. The Corporate Data Protection Officer is involved with all appropriate departments providing support for data protection topics. He can be directly contacted via email at: datenschutz-solutions-de@nttdata.com.

NTT DATA Business Solutions has implemented the OneTrust software solution to underpin its processes globally, especially maintaining its "Record of Processing Activities", managing data breaches, and complying with Privacy Impact Assessments.

We engage with third party suppliers and subcontractors to support our business. With each organization or individual that processes personal data, we ensure that we have the appropriate data processing agreements in place. We sign the latest version (2021) of the Standard Contractual Clauses with each partner outside the European Union / Economic Area unless its country has legislation accepted by the EU's as equivalent to its own. These Standard Contractual Clauses include Transfer Impact Assessments and corresponding technical and organizational measures to protect processed personal data. They cover all services provided to us and remain in place for the duration of the personal data processing.

To be transparent with all data subjects whose data we process, the company provides its privacy policy.

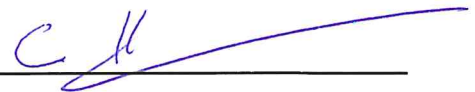
NTT DATA Business Solutions performs all of these activities to ensure that our customers, suppliers, and employees are confident that their personal data is correctly processed. We transform. With Data Protection in mind.



Magdalena Keitel

Chief Compliance Officer

NTT DATA Business Solutions AG



Christian Hering

Corporate Data Protection Officer

NTT DATA Business Solutions AG