

# Global Website Privacy Policy

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*This policy is effective from: 01-Oct-2023*

# Privacy Policy

## 1. Overview

Firstsource Solutions Limited (this expression means and includes its affiliates and subsidiaries) has created this Website Privacy Policy in order to demonstrate Firstsource's commitment to privacy. This Website Privacy Policy demonstrates Firstsource's ('we', 'our', 'us') information gathering and dissemination practices for its corporate website ([www.firstsource.com](http://www.firstsource.com)) or such other websites of Firstsource (together referred hereafter as "Website").

Firstsource is committed to protect the privacy and security of your (users accessing Firstsource Website and/or leaving information on Firstsource Website) personal data.

This Website Privacy Policy ("Policy") does not define how third parties, whose external links are present on Firstsource's Website, use or process your personal data (the terms personal data and data information are interchangeable). We encourage you to read their respective privacy policies and know your privacy rights before interacting with them.

## 2. Relationship

We are the Data Fiduciary / Data Controller of your personal data that we collect and process through the Website. This means we determine how and why personal data is processed.

## 3. What personal data do we collect and how

### Information given by the User or You

We may receive, use and store any information which you enter on our Website or give us in any other way, such as:

- By submitting a web form on our Website, you will share with us information such as your name, phone number and email address to enable us to reply to you. This will be treated as a lawful consent and your personal data will not be shared outside of Firstsource.
- If you are applying for a vacancy with us, please refer to the job vacancy privacy policy for further information on how your data will be used.
- We do not share any personal information collected with any third parties. When completing a web form, we will store and process personal data and as per applicable laws.

- Case 1: Forms on the contact page marked “Suppliers”, “Recruitment”, “Employees”, “Media/Press”, “Investors”, “Analysts” and “Other”
  - We will gather your name, phone number, email address, company, and job title (if applicable), Firstsource office you wish to contact (if applicable), and an optional message. Your details and message will be:
    - a) sent via email to the relevant person within the organisation;
    - b) stored in our database as long as required for business purpose or such other time as per applicable law before permanent deletion.

This information can be removed from our database in case you wish to withdraw consent by sending an email requesting withdrawal of consent to the email address [dpo@firstsource.com](mailto:dpo@firstsource.com).

- Case 2: All other web forms (excluding job applications)
  - We will gather your name, phone number, email address, location,, web page on which you filled out the form, actions taken on our Website, company and job title, industry, the solutions you are interested in, and an optional message.
  - We will also ask in a clear manner for your consent to a) receive marketing communications, and, separately, b) receive personal emails from Firstsource personnel, such as business development representatives. These options will either be presented as checkboxes, or be clearly indicated in the form title, e.g., “Sign up for our mailing list”.
  - Your details and messages and any form of communication with you will be stored in our marketing automation system as long as required for business purpose or such other time as per applicable law. If you opted in to receiving marketing communications, you will be added to the general mailing list and any other mailing lists based on your indicated industry and desired solutions. You may unsubscribe at any time by emailing [dpo@firstsource.com](mailto:dpo@firstsource.com) or clicking “Unsubscribe” at the bottom of any marketing email.
  - If you opted in to receiving personal messages, your details and message will be sent to a relevant member of our business development team. Your details may also be stored in Active Campaign and Salesforce, our CRM system.
  - You can contact us at [dpo@firstsource.com](mailto:dpo@firstsource.com) at any time to remove your information. We will not, without your explicit consent, disclose to anyone outside of Firstsource Solutions Limited any personal information you provide to us when you visit the website.

The data we would like to collect via forms is:

Personal data type:	Source (where Firstsource obtained the personal data from if it has not been collected directly from you, the data subject):
<b>First and last name</b>	Data subject
<b>Email address</b>	Data subject
<b>Phone number</b>	Data subject

<b>Company</b>	Data subject
<b>Job title</b>	Data subject
<b>Firstsource office you wish to contact</b>	Data subject
<b>Your industry *</b>	Data subject
<b>How can we help / desired solutions *</b>	Data subject
<b>Conversion page *</b>	Conversion page *
<b>Past activity on our website *</b>	Cookies
<b>Location (down to city level) *</b>	IP address
<b>Marketing consent *</b>	Data subject
<b>Sales consent *</b>	Data subject
<b>Message</b>	Data subject
<b>Personal data type:</b>	Source (where Firstsource obtained the personal data from if it has not been collected directly from you, the data subject):
<b>First and last name</b>	Data subject
<b>Email address</b>	Data subject
<b>Phone number</b>	Data subject
<b>Company</b>	Data subject
<b>Job title</b>	Data subject

\* Only relevant for forms in Case 2 (details above)

## 4. Email Communication

To help us make e-mails more useful and interesting, we often receive a confirmation when you open an e-mail from Firstsource.com if your computer supports such capabilities.

Our Website provides users the opportunity to opt-out of receiving communications from us and our partners by reading the unsubscribe instructions located at the bottom of any e-mail they receive from us at any time.

## 5. Cookies

To improve your experience on our site, we may use 'cookies'. Cookies are an industry standard and most major websites use them. A cookie is a small text file that our site may place on your computer as a tool to remember your preferences. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this you may not be able to use the full functionality of this Website. Please refer to the cookie policy <https://www.firstsource.com/privacy-policy/> for more detailed information.

## 6. IP addresses

IP addresses are used by your computer every time you are connected to the internet. Your IP address is a number that is used by computers on the network to identify your computer. IP addresses are automatically collected by our web server as part of demographic and profile data known as “traffic data” so that data (such as the Web pages you request) can be sent to you.

## 7. Google Analytics

Our Website uses Google Analytics, a service which transmits Website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand Website traffic and webpage usage.

By using this Website, you consent to the processing of data about you by Google in the manner described in Google’s Privacy Policy (<https://www.google.com/policies/privacy/>) and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or use the opt-out service provided by Google (<https://tools.google.com/dlpage/gaoptout>).

## 8. Social media

Firstsource also uses interfaces with social media sites such as Facebook, LinkedIn, Twitter, and others. If you choose to “like” or “share” information from this Website through these services, you should review the privacy policy of that service. If you are a member of a social media site, the interfaces may allow the social media site to connect your visits to this site with other personal information.

## 9. External links

Our Website may contain links to other websites. Please be aware that we are not responsible for the privacy practices of such other sites. When you go to other websites from here, we advise you to be aware and read their privacy policy.

## 10. What do we use your personal data for?

We use personal data to provide you with information that you have requested, including marketing purposes, sales (if you choose to be contacted for such sales and marketing purposes) and to process online applications.

Firstsource collects information including the following:

- **Internet Protocol address**- which will be anonymised, browser type, browser language, the date and time of your query. This information is collected in the interest of identifying any issues with the site, to establish which areas of the website are used more frequently and to help improve the website.
- **Information provided through the web forms**- including name, email address and contact number will only be used for the purpose of the web form submission including new customer contact, media enquiries and marketing. This will be processed under the lawful basis of consent.

#### **Lawful basis:**

We rely on the following lawful basis, for the above purposes:

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. (For example, we need to process for administrative and record keeping purposes, etc.)
- Where we need to protect your vital interests (or someone else's interests).
- Where we need to comply with a legal obligation.
- Where we have sought your explicit consent.

We will only use personal data for the purposes described above or as otherwise disclosed at the time we request such data from you. Should your personal data be processed for other purposes than those outlined in this Privacy Policy or other purposes than the ones your personal data has originally been collected for, we will update this information to provide you with information on that other purpose, and any additional relevant information.

## 11. Security

We have adopted reasonable and adequate security practices and procedures, in line with industry standards such as ISO 27001:2022, HITRUST, PCI DSS, HIPAA etc. to include strategic, operational, managerial, technical, and physical security controls to safeguard and protect your data and information.

We take steps such as the following to protect your personal data:

- Ensure that the data resides behind the firewall with access restricted to authorized personnel.
- Prevent people entitled to use data processing systems from accessing personal data beyond their needs and authorization.
- Ensure that in the case where processing is carried out by another entity on our behalf, the data is processed only in accordance with the data processing addendums and the agreed contractual obligations.

The information in our custody and control is protected by adherence to reasonable security procedures to safeguard against unauthorized access. We apply encryption or other appropriate security controls to protect personal data when transmitted and stored by us.

## 12. How long do we store your personal data?

We retain personal data only for as long as it is needed for the business purpose defined and as provided under applicable laws. This includes meeting our professional and legal requirements, to establishing, exercising, or defending our legal rights, and for archiving purposes.

Please note that retention periods vary in different jurisdictions and are set in accordance with regulatory and professional retention requirements.

## 13. Disclosure and transfer of personal information

Firstsource keeps your personal information confidential except where disclosure/transfer of personal information is required by an order under the law for the time being in force or by Government agencies including law enforcement agencies having authority of law, upon their request in writing, even without obtaining your consent.

However, sometimes Firstsource uses third parties to process your information. Firstsource requires these third parties to comply strictly with its instructions and not to further transfer your personal information or use it for any purpose other than the purpose for which it is being collected by Firstsource. Firstsource also ensures that they do not use your personal information for their own business purposes unless you have explicitly consented. We ensure this by signing appropriate data processing agreements with such third parties.

We may transfer your personal data to other processing locations in cases where our data centres are in other geographical locations. In such instances, appropriate data transfer agreements are signed with FSL entities in accordance with applicable data protection laws.

## 14. Minor/Child's personal data

Firstsource Website is not meant for minors under the age of 18 years. If you are a minor, please do not use this Website or provide any personal data to us. We are not required to collect any personal data from minors. If we find that any minor has used our application or provided any Personal Data, then we reserve our right to delete such personal data of the minor. If as an authorized user, you come to know that any minor has posted any Personal Data, then you may please contact us using the contact details mentioned in "Contact Us" section of this privacy policy.

## 15. Access to information and your rights



You have the following rights with respect to your personal data: -

- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply to have a right to restrict the processing.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.
- **Right to judicial review:** in the event that Firstsource refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined below.

## 16. Complaint

If you are concerned about an alleged breach of privacy law or any other regulation by Firstsource, you can contact the Firstsource Data Protection Officer who will investigate your complaint and give you information about how your personal data will be handled.

You also have the right to complain to the data protection authority in your country and their contact details are enlisted below:

Country	Data Protection Authority	Address
<b>UK</b>	Information Commissioner Office	Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF
<b>Mexico</b>	National Institute of Transparency for Access to Information and Personal Data Protection (Instituto Nacional de Transparencia, Acceso a la Información y Protección de Datos Personales) (INAI)	Insurgentes Sur 3211 Colonia Insurgentes Copilco, Coyoacán, Ciudad de México'
<b>Philippines</b>	National Privacy Commission	5th Floor Delegation Building, PICC Complex, Vicente Sotto

		Avenue, Pasay City, Metro Manila 1307, or email us at <a href="mailto:dpo@privacy.gov.ph">dpo@privacy.gov.ph</a> .
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## 17. Contact Us

If you have any questions or concerns about this Privacy Policy, or your dealings with this Website, you can contact [dataprivacy@firstsource.com](mailto:dataprivacy@firstsource.com) for clarifications.

Our Data Protection Officer can be contacted at-  
Firstsource Solutions Limited,  
Unit 201 to 204, 2nd Floor,  
Block C2 Brigade Tech Gardens SEZ,  
Brigade Properties Pvt. Ltd, Brooke fields,  
Kundalahalli, Marathahalli Post, Bengaluru,  
Karnataka, 560037

The residents of India may request the content of this policy in any of the 22 languages specified in the eighth schedule of the Constitution of India.

## 18. Changes to this Website Privacy Policy

We may update this Policy from time to time in line with Firstsource's business requirements and changes in applicable laws.

# Annexure A

## **Information Classification Details**

Classification: Firstsource Restricted  
Information Owner (IO): Risk Committee  
Information Custodian (IC): IRM Team  
Authorization List (AL): All employees, prospective/existing clients  
Declassify on: Never

# Annexure B

## Changes Since last versions

Date	Version Number	Changes made
23 <sup>rd</sup> Sep 2023	v1.0	1. First release