



EMPLOYEE PRIVACY NOTICE

This Privacy Notice ("Notice") describes how NCR Iberia, Unipessoal, Lda ("**NCR**", or "**the Company**") will Process personal information about you. Whenever you see the following terms in this notice, they have the meaning set forth below.

"Personal Data" means any information relating to you, whether you are directly identified by the information or can be identified by the information in combination with other data. Examples of personal information about you include your name, addresses, telephone numbers, email addresses, national identification numbers, gender, date of birth, job title, location, and employment history.

"Process" means any action we may take on your personal information, including collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

"Special Categories of Data" means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; the Processing of genetic data, biometric data for the purpose of uniquely identifying a natural person; and data concerning health or data concerning a natural person's sex life or sexual orientation.

1. **How We Obtain Personal Data.** We obtain Personal Data through fair and lawful means. In many cases, we obtain your Personal Data from our interactions with you, such as when you complete an application form or enter information about yourself into our systems. Examples of Personal Data you provide to us may include your name, addresses, telephone numbers, email addresses, and your date of birth. Sometimes we develop Personal Data through your interactions with us, such as through your use of Company equipment, systems and networks. Finally, some of the Personal Data we obtain may come from other sources, such as your manager, or in some cases, (with your prior written consent, where required by law) external sources, such as referees, background checks, or vendors.
2. **Why We Process Personal Data.** Generally, NCR Processes Personal Data as necessary to carry out our employment relationship with you. As such, we may Process your data based on one or more of the following legal bases:
 - **We Process Information to Fulfill the Employment Relationship Between You and NCR:** As your employer, NCR needs to Process Personal Data for normal employment purposes to fulfill our obligation to you. For example, we may Process Personal Data:
 - to consider and make decisions regarding your employment, e.g. Process applications for leave;
 - to evaluate your fitness to perform your job duties and regarding your continued employment;
 - to manage our workforce and offer or provide compensation and benefits; and
 - to administer and track leaves of absence, and to administer payroll (including sick pay, or payment in connection with other leave types).Please refer to NCR policies, including NCR's corporate management policies, for a more detailed explanation of NCR's data Processing practices.
 - **We Process Information to Comply with Legal Requirements:** The Company is subject to numerous legal and regulatory requirements that require us to Process your Personal Data. For example, we may Process Personal Data to comply with the requirements of tax authorities, employment, worker safety, compensation, immigration, transfer and sectorial laws, health and safety laws, equal opportunity obligations, and similar uses. We

may Process your data in connection with the review of alleged non-compliance with laws or to comply with demands of law enforcement and regulators, where permitted by law.

- **We Process Information to Pursue NCR's Legitimate Interests:** In the course of our operations, we may sometimes need to Process data to pursue our legitimate business interests. These interests include prevention of fraud; reporting and investigating suspected wrongdoing; safeguarding Company information and property; obtaining and carrying out work from or for customers or potential customers; in connection with an actual or potential sale, purchase, merger, or reorganization of a part of the Company; an actual or potential change in control or transfer of your employment, or the pursuit or defense of a legal claim. Where Processing is based on our legitimate interests, we take steps to review the impact of our Processing on your interests. We do not Process your data if we determine that our interests are overridden by your rights and freedoms. You are entitled to obtain, upon request (by contacting us at the contacts indicated in 11 below), information on the balancing test NCR carried out.

3. **Types of Personal Data We Process.** The types of Personal Data we Process include your application form and references, your contract of employment and any amendments to it; correspondence with or about you ; payroll and benefits data; business expenses; contact information; records of holiday and other absence data; information needed for equal opportunity compliance; and records relating to your career history, such as training records, performance appraisals, other performance measures and, where appropriate, disciplinary and grievance records. You will, of course, inevitably be referred to in many company documents and records that are produced by you and your colleagues in the course of carrying out your duties and the business of the Company.

We do not Process Special Categories of Data except under limited circumstances where permitted or required by law (please contact HR Central, Global.HRCentral@ncr.com to know the specific local law under which these data are required or can be processed) or where you have otherwise explicitly consented.

We will always obtain your explicit consent to before Processing Special Categories of Data unless consent is not required by law, for example where the information is required to protect your vital interests or those of a third person and where you are not able to provide consent.

If we are Processing Special Categories of Data based on your consent, you have the right to withdraw that consent at any time.

In addition, while health data is a Special Category of Data, as your employer, NCR may need to Process information relating to your health, which could include reasons for absence, clearance to return from an absence, or information regarding a disability in the context of discussing reasonable accommodations. In such case, your consent may not be required as your information will be used to comply with our health and safety and occupational health obligations, and to consider how your health affects your ability to do your job and whether any adjustments to your job might be appropriate. We will also need this data to administer and manage statutory and company sick pay, disability or other benefits, including health insurance or life insurance policies.

If you provide the Company with Personal Data such as contact information and Special Categories of Data such as health data about beneficiaries, domestic partners, family members and emergency contacts, it is your responsibility to inform such individuals of their rights and to obtain their explicit consent, where necessary, to the processing (including transfers) of that Personal Data including Special Categories of Data, where necessary and in compliance with applicable laws, as set out in this Notice.

Providing Personal Data, which processing is essential for the Company to comply with its contractual and legal obligations is mandatory, and any refusal to provide such Personal Data may result in the Company being unable to continue the employment relationship with you. Providing Personal Data for any other processing purposes included in this Notice is optional and any refusal to provide such Personal Data will have no consequences on our employment relationship with you.

4. **Disclosures and Transfers of your Personal Data.** We will not disclose your Personal Data to our employees, contractors or other third parties except where it is necessary to carry out our obligations as an employer, or as otherwise permitted or required by law. For instance, NCR may transfer your Personal Data to:

- other Company entities as permitted by applicable law and as described below;
- law enforcement officials, attorneys, auditors, consultants, and government officials, to protect our respective rights or property, and/or the rights or property of our customers, business partners, or suppliers, or other third parties;
- potential purchasers or investors and their advisors in the case of an actual or potential purchase, divestiture, merger, change of control, transfer, or reorganization;
- customers or potential customers, in the course of obtaining or carrying out work for them;
- service providers, in the course of their performance of services to the Company. Examples of such service providers include:
 - Recruitment systems and HR systems vendors
 - Payroll vendors
 - Document management vendors
 - Relocation service providers
 - Background verification providers (with your consent, where required by law)
 - Benefits and insurance providers
 - Providers of systems that facilitate complaint and inquiry management
 - IT providers, including security providers and email providers
 - Contingent workers
 - Managed service providers
 - Consultants

If permitted by law, we may also provide information about you to other third parties, such as prospective employers that seek to verify your employment with us; however, in such case we will only release your current or last job title and dates of employment without your further consent.

When we disclose information to third parties, it is our policy to transfer such data supported by appropriate safeguards. Examples of such safeguards include requiring the third party to implement appropriate security and privacy controls and including appropriate contract terms designed to hold the third party accountable for preserving the privacy, confidentiality, integrity and availability of such information. In all cases, it is Company policy to disclose or transfer Personal Data only to recipients with a “need to know” it to carry out an applicable authorised purpose.

5. **Cross-Border Data Transfers.** The Company operates on a global basis. Accordingly, we may transfer information about you outside of your country to other Company affiliates or to third party organizations for purposes connected with your employment or the management of the Company's business, under the terms above referred. Some of these countries have laws that do not provide the same level of protection as the law of the European Union. It is the

Company's policy to transfer such data supported by appropriate safeguards consistent with the standards required by the European Union (e.g. adequacy decision under Article 45/ binding corporate rules, under Article 47/ standard data protection clauses under Article 46.2 all from the GDPR). With respect to Company affiliates, each affiliate that may Process Personal Data has signed NCR's Intra-group Data Transfer Agreement that requires the protection of Personal Data consistent with the standards required by the European Union, i.e., based on the EU Standard Contractual Clauses (adequacy decision under Article 45 of the GDPR. Please contact NCR's Data Protection Officer to receive a copy of this document and for a list of these countries. With respect to third parties, it is Company policy to enter into appropriate agreements designed to ensure the privacy and security of your data.

6. **Monitoring.** To the extent permitted by law, we monitor your use of the Company's information technology infrastructure, including your use of the Company's network and applications, Company-provided computing devices (such as computers and mobile devices) and Company-provided telephones (including, where applicable, company-provided mobile telephone), as detailed in Corporate Management Policy 1404 (Information Technology Infrastructure Policy), available on the Company's Intranet.

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In such cases, your Personal Data will be maintained securely and accessed only by such persons as have a legitimate reason to view it. Except under circumstances where we are legally required to maintain it, your Personal Data collected through monitoring activities will be deleted in accordance with our data retention and destruction policy.

Additional and/or different rules applicable to monitoring use of the Company's information technology infrastructure than the rules stated in the Information Technology Infrastructure Policy as well as in our data retention and destruction policy may apply pursuant to the law applicable in each jurisdiction where NCR operates and shall replace and prevail over the Information Technology Infrastructure Policy as well as our data retention and destruction policy.

In some facilities, the Company may use video-only security cameras ("CCTV") to protect the Company's assets and to promote the safety of its workforce. CCTV may collect your Personal Data; however, NCR does not use these systems to regularly monitor your behavior or performance. Security cameras are not deployed in areas where you have an expectation of privacy, including toilet facilities, changing rooms, or private offices. The use of security cameras is further detailed in the CCTV Protocol, which is available on the Company's intranet [https://intranet.ncr.com/f5-w-68747470733a2f2f696e7472616e65742e6e63722e636f6d\\$/index.php?option=com_content&view=frontpage&Itemid=10624](https://intranet.ncr.com/f5-w-68747470733a2f2f696e7472616e65742e6e63722e636f6d$/index.php?option=com_content&view=frontpage&Itemid=10624).

With respect to certain job functions, and if and where permitted by local law, NCR may use GPS or other geolocation identification to monitor employees. Where required by law, we will obtain your prior consent to such monitoring.

The Company may also keep records of your work hours to comply with legal or customer contract requirements through use of Company time tracking systems, if and where permitted by local law.

7. **Automated Individual Decision Making.** While we may engage in certain machine-based analysis of our employees for analytics purposes, NCR does not engage in any decision making with respect to your employment, evaluation of your performance, or discipline that is automated and not subject to human review and intervention.

8. **Your Individual Rights.** The law provides you with certain rights with regard to your Personal Data:

- You have the right to obtain confirmation from us whether your Personal Data is being Processed by us, the right to request from us access to your Personal Data, and certain details about your information we Process.
- You have the right to request that we rectify incorrect information about you and to have incomplete Personal Data completed.
- In certain instances, you may have the right to have your data erased, for example where the data is no longer needed for the purpose for which they were collected; where you have withdrawn consent and there is no other legal ground for Processing; where you object to Processing based on our legitimate interests, and NCR has no compelling reason to continue with such Processing; where the Processing was illegal; or where erasure is required by law to which NCR is subject.
- In certain instances, you may have the right to restrict Processing of your information, including while NCR undertakes to verify the accuracy of your data where you have contested its accuracy; where NCR's Processing is unlawful and you have the right to erasure, but request that we restrict Processing instead; where the data are no longer needed for the purposes of the Processing by us, but they may be required by you for the pursuit or defence of a legal claim, or by NCR where its legitimate interests override your request for restriction.
- In certain instances, you may have the right to data portability of information you have provided to NCR, for example, where we Process information by automated means based on your consent, or pursuant to a contract with you.
- In certain instances, you may have the right to object to the Processing of your Personal Data, for example, where your Personal Data is Processed for marketing purposes.

In many cases, we will make available self-help tools to enable you to enter or edit Personal Data. If you need assistance with obtaining your information, please contact HR Central, Global.HRCentral@ncr.com. You may also exercise your rights by contacting us at the contacts indicated in 11 below

9. **Processing Your Information Based on Consent.** In some cases, we may ask for consent to Process your data. For example, we may ask for consent to use a picture of you on a company website. If you have provided consent for the Processing of your data, you have the right to withdraw that consent at any time (by contacting us at the contacts indicated in 11 below), which will not affect the lawfulness of the Processing before your consent was withdrawn.

10. **Data Retention and Destruction.** We retain your Personal Data while it is needed to fulfill its intended use and to comply with applicable legal requirements. When no longer needed, we either anonymize or dispose of your Personal Data using methods designed to prevent its loss, theft, misuse, or unauthorised access after disposal. Corporate Management Policy (CMP) #206:

https://intranet.ncr.com/index.php?option=com_content&view=frontpage&Itemid=3962#HR

11. **Making Inquiries**

We strive to be transparent with our data handling practices, and we welcome any questions or concerns you may have. You may contact our Data Protection Officer by emailing EU.DPO@ncr.com.

Or NCR directly at:

NCR Corporation
c/o NCR Law Department
864 Spring Street NW
Atlanta, GA 30308

12. **Lodging Complaints.** You may lodge complaints about the Company's data handling practices if you do not believe we have complied with the law with the the Commissioner's Office Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF in the United Kingdom, or with your local data protection authority, Comissão Nacional de Proteção de Dados at <https://www.cnpd.pt/bin/cnpd/atendimento.htm>.
13. **Identity and contact details of controller** NCR Iberia, Unipessoal, Lda] with head office at n.º 3-C 3-D, Largo de Santa Bárbara, Anjos, 1150-287, Lisbon, Portugal, and NCR Corporation (collectively the "Company", "we" or "our") are co-controllers of your data.