

Statement on Compliance with the GDPR for Tech Mahindra



Table of contents

1. BACKGROUND.....	3
2. INTRODUCTION	3
3. APPOINTMENT OF ORGANIZATION WIDE DATA PROTECTION OFFICER FOR TECH MAHINDRA.....	3
4. TECH MAHINDRA’S COMMITMENT TO GDPR COMPLIANCE.....	4
5. COMPLIANCE PROGRAM AT TECH MAHINDRA	4
Thank You	6

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1. BACKGROUND

GDPR provided an opportunity to design, build and enforce increased trust across the entire organization, safeguarding the personal data rights of individual citizens, customers, and associates—and turning that into wider operational and business gains.

The GDPR (the General Data Protection Regulation) that came into force in May 2018 was a game changer for many organizations. It triggered additional obligations to review internal processes and to implement appropriate technical and organizational measures and further embed data privacy in their internal culture while putting in place the right governance. These changes were designed to enable them to act as accountable organizations and to “be able to demonstrate compliance” with the principles relating to personal data processing under enhanced liabilities and sanctions. But ultimately, they were an opportunity to design, build and enforce increased trust across the entire organization, safeguarding the personal data rights of individual citizens, customers, and associates—and turning that into wider operational and business gains.

2. INTRODUCTION

Tech Mahindra is committed to highest standards of information security and privacy protection. We place a high priority on protecting and managing data in accordance with accepted standards including ISO 27001, ISO 27701, ISO 27017, ISO 27018 and PCI-DSS. The company complies with all applicable GDPR regulations including as a data controller and as data processor, while also working closely with our customers and partners to meet contractual obligations for our procedures, products, and services. Our team of experienced business analysts, consultants, and digital specialists also help to support customers in meeting their obligations through the provision of expert services and value-adding solutions.

3. APPOINTMENT OF ORGANIZATION WIDE DATA PROTECTION OFFICER FOR TECH MAHINDRA

Vasanth Pai has replaced Sunil Sanger as the Tech Mahindra Data Privacy Protection Officer (DPO) globally on August 1st 2021 . He is currently heading the office of Privacy and will work independently as DPO while being aligned through Group General Counsel (“Group GC”) to the CEO/Board of Directors. This appointment is in conformity to the General Data Protection Regulations (GDPR) which officially became EU Regulation 2016/679, heralding a new era of data protection across the European Union, leading to varied ramifications for companies around the world.

Tech Mahindra’s Data Privacy Protection Officer informs, advises, and monitors compliance. The company implements appropriate controls and tools that support the process, provide necessary privacy, security safeguards and ongoing delivery of Data Privacy and Data Protection objectives.

DPO is accountable and responsible to:

- Inform and advise the controller or the processor and the employees about data protection provisions

- Monitor compliance with the EU General Data Protection Regulation, including the assignment of responsibilities, raising awareness, and training of staff involved in processing operations, and the related audits
- Provide advice when requested on data protection impact assessments
- Cooperate with the regulatory supervisory authorities
- Act as the first contact point for the supervisory authority and individuals whose data has been processed

4. TECH MAHINDRA'S COMMITMENT TO GDPR COMPLIANCE

Tech Mahindra has implemented the program to achieve GDPR compliance. As stated in its [Code of Business Ethics](#), Tech Mahindra is committed to protecting privacy and the personal data it receives from its associates, clients, and/or from other stakeholders.

Tech Mahindra has security, privacy protection and business continuity management systems and certifications, including ISO 9001, ISO 27001, ISO 27701, ISO 27017, ISO 27018 and ISO 22301, PCI-DSS and IGSOC, to ensure our own compliance.

It is important to recognize that compliance is a shared responsibility among customers, suppliers and all organizations will need to adapt business processes and data privacy protection compliance management practices.

5. COMPLIANCE PROGRAM AT TECH MAHINDRA

Tech Mahindra has a robust ISO 27701 Privacy Information Management System (PIMS), ISO 27001 based Management System (ISMS), ISO 27017, ISO 27018 for Cloud Security and Cloud Privacy to ensure compliance. It has implemented additional or augmented company-wide controls to meet GDPR requirements within the ISMS, PIMS using internal and external advisors. With governance from CISO and DPO, we have updated data privacy protection policies, information security policies and procedures. Information Control and Classification policy, gap analysis, data protection, risk assessments, communication and training programmes, compliance are supported by a review of existing contracts with the data controllers, the use of sub-contractors and any data processing and data transfer/ export agreement arrangements.

For Tech Mahindra, Data Privacy is a top priority. We make this a reality by undertaking the following:

Governance: A global governance which includes Data Protection Officers among others, privacy lawyers, security, and cybersecurity professionals at Corporate and local levels of customer engagement dedicated to ensuring deployment of the GDPR program

Awareness and Training: Mandatory Privacy and security awareness training for associates through e-learning and test, including account-specific privacy and security training as per customer engagements

Data Protection and Security: Compliance with security standards' best practices, Data Leakage Prevention

Policies and Processes: Update and implementation of privacy and security policies, guidelines, privacy impact assessments, records of processing and tools for GDPR compliance to integrate privacy-by-design, data minimization, third-party due diligence

Data Subject Rights: To enable timely closure of data subject access requests SAR, DSRs.

Incident Management: Privacy and Security incident response process and client-specific incident response plans as Tech Mahindra handles each of the privacy and security incidents to closure.

Audits and Assessments: Regular maturity audits and assessments with observations communicated to the highest level of management and mandatory remediation plans.

How to Contact:

If you have any questions about the organization privacy policy, privacy practices, privacy statement, any concerns, or complaints regarding the treatment of your privacy or a possible breach of your privacy, please contact our Data Privacy Protection Officers as per contact details below:

DPO (Global): Vasanth Pai who can be reached at dpo@techmahindra.com

Contact address: Tech Mahindra Limited, Wing - I & II, Oberoi Garden Estate, Off, Saki Vihar Road, Chandivali, Andheri East, Mumbai – 400072 India **India Phone:** +91 022-66882000

DPO (EU, Europe,UK,France): Jakob Stenstave who can be reached at dpo@techmahindra.com
Contact address: Klarabergsviadukten 63, SE-111 64 Stockholm, Sweden.

DPO (Germany): Sabine Stangenberg who can be reached at dpo@techmahindra.com

Contact address: Tech Mahindra GmbH Fritz-Vomfelde-Str. 840547 Düsseldorf, Germany

DPO (Philippines): Joanna Concepcion Armas who can be reached at dpo@techmahindra.com

Contact address: Eastwood City, Quezon City | PH-Manila.

DPO (China): Julia Xue who can be reached at dpo@techmahindra.com

Contact address: Room 2201, No. 8 Building, Inspiring Space (Office Building), No. 25, Ganluyuan Nanli, Chaoyang District, Beijing, PRC, China.

Important Note: *We shall treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your request or complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your request or complaint is resolved in timely and appropriate manner.*

End of Statement

Thank You

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