



Global Privacy Notice
for Applicants, Employees, and Contractors

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Global Privacy Notice for Applicants, Employees, and Contractors

Last Updated: May 25, 2026

1. Introduction

As part of our commitment to protecting your personal data and processing it in a transparent manner, this Privacy Notice (“**Notice**”) provides information on the personal data collected and processed by Everest Global, Inc. d/b/a Everest Group and its corporate affiliates listed in Appendix 1 (collectively, “**Everest Group**”) in connection with our relationship or potential relationship with you (“**you**” or “**your**”) as an applicant, candidate, employee, or contractor. This Notice is provided by the Everest Group (“**we**”, “**our**” or “**us**”). If you are employed by Everest Group or retained by Everest Group as a contractor, this Notice does not form part of your contract of employment or contractor engagement agreement.

2. Who does this Privacy Notice cover?

This Notice covers all employment applicants, candidates, employees, individual contractors (including current and former), interns, temporary workers, and directors of Everest Group. We also may process the personal data of other individuals whose data is provided to us in connection with these relationships (e.g., next-of-kin, emergency contact information and/or dependents).

This Notice describes the personal data that may be collected from you and about you, the purposes for which that personal data is collected, stored and used, and our reason for doing so (also referred to as our “legal basis”). In this Notice, we outline the categories of internal Everest Group functions that may access or use your personal data, and the circumstances in which it may be shared with vendors, service providers, and professional advisors (e.g., legal counsel, auditors, insurers, etc.). We also summarize your rights in relation to our processing of your personal data and how you can exercise these rights.

Please take the time to read and understand this Notice, which should be read in conjunction with our other corporate policies and procedures. When appropriate, we will provide a "just in time" notice to cover any additional processing activities not mentioned in this document.

3. Who is the data controller for your data?

The Everest Group entity that employs you, engages you as a contractor, or to which you apply for a role is the data controller of your personal data. A list of Everest Group entities is set forth in Appendix 1 to this Notice.

In certain circumstances, other Everest Group affiliates may also process your personal data for legitimate business purposes consistent with this Notice.

4. Why have you been provided with this Privacy Notice?

We are required under applicable data protection and privacy laws to provide you with information about how we collect, use, store, and otherwise process your personal data in connection with your application for employment, your engagement with Everest Group, or your ongoing relationship with us.

This Notice also explains your rights in relation to our processing of your personal data and how you may exercise those rights.

5. Our contact details

If you have any questions about this Notice, about how your personal data is processed, or if you wish to exercise your data protection rights, you may contact Everest Group's Data Protection Officer:

Data Protection Officer
Everest Group
700 Central Expy S, Suite 400,
Allen, TX 75013
United States of America

Email: privacy@everestgrp.com

6. What types of personal data do we process?

We may process personal data relating to you, and where applicable, to individuals whose information you provide to us (such as emergency contacts or dependents), in connection with your application, engagement, employment, or other professional relationship with us.

The categories of personal data we may process include the following:

i. Identification and contact information

We may process the following categories of identification and contact information:

- Full name and any previous names
- Preferred name
- Date of birth
- Gender or sex
- Nationality and citizenship information
- Employee ID
- Photograph
- Government-issued identification numbers (such as national identification number or tax identification number)
- Home and mailing address
- Personal and business telephone numbers
- Personal and business email addresses
- Emergency contact details

ii. Immigration and right to work information

We may process the following categories of immigration or right to work information:

- Passport and visa information
- Work permit information
- Immigration and eligibility to work documentation

iii. Employment and engagement information

We may process personal data relating to your role or potential role with us, including:

- Job title, position, and department
- Work location
- Employment or engagement contract details
- Compensation, payroll, and benefits information, including information relating to dependents or beneficiaries where relevant to benefits administration
- Start and end dates of employment or engagement
- Employment status (such as full-time, part-time, contractor, or temporary worker)
- Reporting lines and organizational role
- Working hours and patterns
- Training and development records
- Performance evaluations and disciplinary records
- Grievance and complaint records
- Attendance, leave, and absence records
- Records relating to workplace investigations, disputes, legal claims, regulatory or compliance matters, or settlement arrangements (where applicable)
- Health and safety records (where applicable)
- Professional licenses, registrations, and regulatory status (where applicable)
- Exit and offboarding information

iv. Application and background information

In connection with your application and participation in our recruitment and selection process, we may process information including:

- Curriculum vitae (CV) or résumé
- Employment history and professional background
- Educational background and qualifications
- Professional certifications and licenses
- Information provided during interviews
- References (where applicable)

Where permitted by applicable law and relevant to the role, we may also conduct background verification checks, which may include:

- Employment verification
- Education verification
- Criminal background checks (see Section 11)
- Credit or financial checks
- Driving record checks

v. Assessment Information

We may process information generated during interviews and assessments, including:

- Interview notes and evaluation records
- Assessment results and scores
- Recruiter observations and feedback

Where assessments are conducted remotely, we may process technical information necessary to administer, record, and secure the assessment process, such as session timestamps or system access data.

vi. Security and Access Control Information

We may process information relating to physical access to Everest Group premises in India for security and access management, including, where applicable, biometric data (such as fingerprint or facial recognition data) used for facility access control and related administrative purposes. Additionally, we

may process information relating to you captured on closed-circuit television (CCTV) footage at Everest Group premises, as well as building access records and security logs.

vii. IT systems and communications

To the extent permitted by applicable law, we may process information relating to your use of Everest Group's information technology systems for security, operational, compliance, and business management purposes. This may include:

- System access credentials and identifiers
- Log-in records and access logs
- Device and network information (such as IP address and system logs)
- Use of company systems, applications, and communication tools
- Records of acknowledgment of corporate policies
- Technical logs and system-generated metadata relating to platform use

Everest Group's technology systems and communication tools are provided for business use. Use of these systems may be subject to monitoring and review.

7. How do we collect your data?

We collect personal data about you from a variety of sources, including directly from you, from third parties, and through your use of Everest Group systems and facilities.

i. Information collected directly from you

We primarily collect personal data directly from you. You may provide this information in a number of ways, including:

- During the recruitment and onboarding process
- Through employment or engagement documentation
- By entering information into HR or other internal systems
- Through your participation in workplace processes (such as performance management, training, compliance, or engagement activities)
- Through your use of Everest Group systems, applications, and communication tools

Where permitted by applicable law, business-related telephone or video calls may be recorded. Such recordings may be used for quality assurance, training, compliance, client relationship management, operational continuity, and related business purposes.

Business communications (including emails and other messages sent or received using Everest Group systems) may be stored in internal systems used to manage client relationships and business operations.

ii. Information collected from colleagues and internal sources

We may receive personal data about you from colleagues, including managers, Human Resources personnel, compliance teams, and other employees, in connection with workplace processes, performance management, investigations, compliance matters, or other employment-related activities.

iii. Information collected from third parties

Where appropriate and permitted by applicable law, we may collect personal data about you from third parties, including:

- Recruitment agencies, referees, educational institutions, and background screening providers
- Customers or business partners, where relevant to your role or performance
- External training providers or survey platforms
- Medical professionals or occupational health advisers, where necessary to assess fitness for work or workplace accommodations
- Insurance providers, brokers, or appointed agents in connection with workplace incidents or benefits administration
- Tax authorities, payroll agents, and financial advisers
- Pension or benefit scheme administrators
- Regulatory or licensing authorities
- Publicly available sources where relevant to your role, compliance obligations, or in connection with workplace processes or investigations.

Where you are hired or managed under a global employment model using a third-party Employer of Record (EOR), personal data required for onboarding, payroll, and compliance may be collected and processed through the EOR platform in accordance with applicable law.

iv. Information collected through systems, monitoring, and facilities

We may collect personal data generated through your use of Everest Group's systems and facilities, including:

- Log-in records and system access logs
- Technical logs and metadata associated with system or platform use
- business communications, calendar information, meeting metadata, collaboration platform content, files, messages, and related records created, stored, transmitted, or accessed through Everest Group systems or devices
- Building access records and CCTV footage (as described in Section 6)

In India, biometric data (such as fingerprint or facial recognition data) may be collected for facility access control and related administrative purposes, as described in Section 6.

Everest Group systems, devices, networks, email systems, calendars, collaboration tools, communication platforms, and business applications are provided for business use. To the extent permitted by applicable law, Everest Group may monitor, access, review, or audit information created, stored, transmitted, received, or accessed using Everest Group systems, devices, accounts, or networks, including business communications, files, and activity logs. Such monitoring may occur for purposes including: security and fraud prevention; regulatory compliance; investigation of suspected policy violations or misconduct; and protection of confidential or proprietary information.

v. Use of AI-assisted tools

Everest Group may use AI-assisted or automated tools to support recruitment, client management, operational efficiency, and internal productivity. These tools may analyze business communications or user inputs to generate summaries or operational insights to support business activities. Such tools are designed to assist human decision-making and do not result in solely automated decisions that produce legal or similarly significant effects, unless otherwise disclosed.

8. Data relating to third parties

In certain circumstances, you may provide us with personal data relating to other individuals (such as emergency contacts, dependents, or beneficiaries). Where you provide such information, you are responsible for ensuring that you have informed the relevant individual that their personal data will be provided to Everest Group and for directing them to this Notice where appropriate.

We process such personal data only for relevant employment, benefits administration, emergency contact, legal, compliance, or regulatory purposes.

9. What are the purposes and reasons for processing your data?

i. Processing purposes

Your personal data may be collected and processed for various business purposes, in accordance with applicable law. In limited circumstances, personal data may be processed for additional purposes, including in connection with investigations, legal proceedings, compliance reviews, or disciplinary matters.

Everest Group and Everest Group Affiliates process your personal data for specific and legitimate business purposes and process the personal data relevant and reasonably necessary to achieve those purposes. Personal data may also be processed through third-party tools, including those integrated into our HR, survey, productivity, or operational platforms. These platforms may use automated analytics or AI-assisted functionality to support business operations and decision-making.

We process your personal data for the following purposes and related compatible purposes:

- a. **Applicant/candidate attraction, assessment, and selection:** This includes all activities in connection with recruitment (including vetting and background checks). Where relevant, appropriate, and permitted by applicable law, this may include identity and right-to-work verification, employment and education verification, professional qualifications and regulatory status checks, criminal background checks, credit or financial background checks where relevant to the role, and fraud prevention checks.

This may also include the processing of your assessment performance data, feedback, and interview responses.

Your personal data may also be collected, submitted, or processed through third-party recruitment and assessment platforms.

- b. **Workforce management and development:** This includes all activities undertaken in managing and administering the relationship between Everest Group and its employees and workers. This includes talent management, assessment, development, employee relations, benefits including administrative support, and administrative processing related to work location, travel, payroll, tax, immigration, or regulatory requirements, including:

- training, development, promotion, career and succession planning
- allocating and managing duties and responsibilities and the business activities to which they relate, including business travel and tax matters

- supporting internal collaboration and productivity through approved enterprise AI tools, including the review of prompts and outputs where necessary to ensure compliance with company policy and proper use guidelines
 - identifying and communicating effectively with staff
 - managing conduct and performance processes, handling complaints and investigations and operating other informal and formal HR processes and making related management decisions
 - processing information about absence or medical information regarding physical or mental health or condition in order to administer related benefits, determine fitness for work, facilitate a return to work, or to make adjustments to your role or the workplace
 - making management decisions regarding employment or engagement or continued employment or engagement or redeployment and related processes
 - complying with applicable laws and regulations (for example employment, working time, health and safety, and tax laws and regulations to which we are subject in the conduct of our business)
 - complying with reference requests where Everest Group is asked or required to act as a referee
 - where relevant, publishing appropriate internal or external communications or publicity material including via social media in appropriate circumstances
- c. **Managing compensation and administering benefits:** This includes management of compensation, benefits, and retirement entitlements. It may also include reimbursing business costs and expenses, and making appropriate tax and social security deductions and contributions. Where employment is facilitated through an Employer of Record (EOR) model, your personal data may also be shared with or collected by an Everest Group third-party global employment provider to manage payroll, tax, and benefits in the relevant jurisdiction.
- d. **Promoting inclusion and preventing discrimination:** This includes activities undertaken in support of equal employment opportunity and anti-discrimination compliance. This category includes, where permitted by applicable law, managing monitoring programs related to equal employment opportunity and anti-discrimination compliance. Where required by applicable law, such processing will be subject to appropriate safeguards and carried out only to the extent necessary for compliance with applicable obligations and laws.
- e. **Management and improvement of Everest Group systems and operations:** This includes improvements to HR systems, management of technology systems and processes, business transformation, and changes to Everest Group's structure and operations. This category includes:
- business contingency planning
 - engagement with employees (and/or employee representatives) for planning, managing, and carrying out restructuring or redundancies or other change programs (including consultation, selection, alternative employment searches, and related management decisions)

- conducting surveys and benchmarking activities to identify improved ways of working, support employee engagement, and improve workplace operations
- planning, due diligence, and implementation in relation to a commercial transaction or service transfer involving Everest Group that impacts your relationship with Everest Group (for example a transfer of your employment under applicable automatic transfer laws)
- implementing email, technology, internet, social media, HR-related and other company policies and procedures
- providing technical support and maintenance for HR information systems and managing access permissions
- supporting operational administration, workforce planning, resource management, internal reporting, and business process improvement activities

f. **Prudent business management and protecting and enforcing Everest Group rights:** This includes vendor management, management and strategy, and management reporting activities. This category includes:

- business operational and reporting documentation such as the preparation of annual reports or tenders for work or client team records including the use of photographic images
- supporting HR administration and management and maintaining and processing general records necessary to manage the employment, worker or other relationship and operate the contract of employment or engagement
- operating relationships with customers, suppliers, vendors, service providers, and other third parties, including: (i) disclosing information where reasonably necessary to satisfy client, contractual, legal, regulatory, or security requirements; (ii) providing contact details, professional biographies, CV information, qualifications, or photographic images for identification or business purposes and (iii) disclosing information to service providers or data processors supporting Everest Group operations
- managing and supporting employee and contractor participation in business development, marketing, branding, analyst relations, recruiting, conferences, webinars, events, media engagements, thought leadership initiatives, and other external business activities.
- publishing or sharing professional profile information, including names, business contact information, photographs, biographies, job titles, qualifications, areas of expertise, presentation materials, recordings, and related professional content on Everest Group websites, collaboration platforms, social media channels, event platforms, client materials, proposals, marketing communications, press materials, analyst content, or other business communications;
- administering, hosting, recording, transcribing, summarizing, distributing, or analysing webinars, meetings, events, presentations, training sessions, and related business interactions involving employees or contractors, including through third-party event, collaboration, productivity, CRM, marketing, transcription, or AI-assisted platforms.

- g. Protection of business, clients, staff, and systems:** This includes protecting the private, confidential, and proprietary information of Everest Group, Everest Group Affiliates, and our employees, clients, and third parties.

To the extent permitted by applicable law, this may include monitoring, reviewing, and maintaining Everest Group technology systems, infrastructure, devices, networks, and enterprise platforms in order to protect system integrity, safeguard confidential information, maintain security, investigate misconduct, and ensure compliance with applicable policies and legal obligations.

We may also conduct searches, audits, reviews, or investigations involving information stored on Everest Group systems where reasonably necessary for legitimate business, legal, compliance, operational, or security purposes.

We may review the use of AI-assisted and other enterprise tools, including prompts and output history, where reasonably necessary to ensure compliance with applicable policies, governance standards, confidentiality obligations, security requirements, or legal obligations.

Any monitoring, review, or investigative activities will be conducted in a proportionate manner and in accordance with applicable law.

- h. Meeting our regulatory and compliance obligations and preventing crime:** This includes carrying out regulatory compliance checks, making disclosures to, and complying with requests from public authorities, regulators (whether inside or outside of the country where you reside or the European Economic Area) or governmental bodies across our global group, and investigating conduct and preventing fraud and other crime. This includes:

- activities to enforce our legal rights and meet our obligations, and activities relating to legal claims made by, against, or otherwise involving you.
- actions we take to comply with lawful requests by public authorities (including for national security or law enforcement requirements), disclosure requests, or where otherwise required or permitted by applicable laws, court orders, government regulations, or regulatory authorities (including data protection, tax, and employment authorities), in all cases whether within or outside your country of residence.
- processing activities to satisfy our regulatory obligations to supervise the persons employed or appointed by us to conduct business on our behalf, including preventing, detecting, and investigating a wide range of activities and behaviours, whether relating to specific business dealings or to the workplace generally, and liaising with regulatory authorities.
- ensuring compliance with cross-border regulatory requirements where personal data is processed through global payroll, tax, or employment platforms

We may also process personal data for additional purposes where required or permitted by applicable law and where appropriate notice is provided.

Additional information regarding specific processing of personal data and sensitive/special category personal data may be notified to you locally or as set forth in applicable policies.

For employees and contractors, additional information regarding technology monitoring, acceptable use requirements, and the management of confidential information is set forth in Everest Group's related corporate policies.

ii. Our legal basis for processing your data

The personal data processing described in this notice may be:

- a. necessary to enter into contracts with you relating to your employment or engagement with us and perform our obligations under such contracts.
- b. necessary to comply with applicable legal and regulatory obligations, including obligations relating to employment, tax, payroll, workplace safety, immigration, anti-discrimination, corporate governance, financial reporting, and data protection laws.
- c. necessary for the legitimate interests of Everest Group or others (as described below), where these are not overridden by your interests or fundamental rights and freedoms.

Where Everest Group relies on legitimate interests as the lawful basis for processing, we have assessed that: (i) the processing serves a clear and identifiable business or operational purpose; (ii) the processing is necessary and proportionate to that purpose and is not more intrusive than reasonably required; and (iii) our interests are not overridden by your privacy interests, rights, or freedoms, having regard to your reasonable expectations as an employee, contractor, or applicant.

- d. based on your explicit consent, only in circumstances where we are required to obtain it under applicable law
- e. in limited circumstances where no other lawful basis applies, processed with your consent.

Where personal data is processed through third-party recruitment platforms, job boards, or enterprise productivity tools, such processing is generally carried out under lawful bases other than consent, including contractual necessity or legitimate interests, and may also be subject to the privacy notices and user terms of those platforms.

The “legitimate interests” referred to above include:

- managing and operating Everest Group’s business and the processing activities described in Section 9(i) above where such processing is not otherwise required to perform contractual or legal obligations
- complying with regulatory requirements and cooperating with regulators and governmental authorities globally
- protecting Everest Group’s business operations, legal rights, systems, confidential information, and property interests

We may retain your CV and application materials for a period after the recruitment process concludes to consider you for future job opportunities and for related business, legal, compliance, and recordkeeping purposes. This retention is based on our legitimate interests in maintaining a talent pipeline, supporting recruitment administration, and meeting applicable legal and regulatory obligations. You may object to this processing at any time by contacting privacy@everestgrp.com.

10. Purposes of processing sensitive/special category personal data

Sensitive/special category personal data may be processed where permitted or required by applicable law, including for one or more of the following purposes:

- i. the processing is necessary to comply with employment, social security, social protection, workplace safety, anti-discrimination, benefits administration, accommodation, or related obligations and rights under applicable law.

This may include the following, although this is not an exhaustive list:

- a. processing health, medical, disability, or accommodation-related information to comply with, and exercise our rights under, employment, health and safety, or social security laws (for example, to provide statutory incapacity or parental benefits), avoid breaching legal duties to you, support fair and lawful employment practices and management, administer attendance, leave, and absence management processes, administer Everest Group's private medical and long term disability schemes, and make reasonable accommodations or adjustments.
- b. processing trade union membership information where necessary to comply with any relevant rights that you may have in connection with any trade union membership, as required to enable us to meet our obligations under employment law.
- c. biometric data, including facial recognition or fingerprint-based authentication data, may be collected through access control or attendance systems deployed at Everest Group offices located in India for the following purposes:
 - (i) access and authentication;
 - (ii) attendance administration; and
 - (iii) workplace safety and security.

Biometric data collected for these purposes is not used for profiling or solely automated decision-making and is processed using appropriate technical and organizational safeguards.

- d. processing information relating to racial or ethnic background, religion, sexual orientation, health status, disability status, or other protected characteristics may occur in connection with:
 - (i) complaints, investigations, grievance procedures, whistleblowing matters, anti-harassment or anti-discrimination matters;
 - (ii) workplace accommodations;
 - (iii) equal employment opportunity compliance;
 - (iv) or other employment-related legal obligations,

where such information is relevant and processing is permitted or required by applicable law.

- e. processing information relating to criminal convictions or offences where permitted by applicable law and necessary for employment screening, background checks, regulatory compliance, workplace safety, fraud prevention, or legal obligations.
- ii. the processing is necessary for the establishment, exercise, or defence of legal rights and claims.
- iii. the processing is necessary for reasons of substantial public interest where permitted by applicable law.
- iv. the processing relates to sensitive/special category personal data that has been manifestly made public by you, where permitted by applicable law.
- v. solely where required by applicable law and where no other lawful basis applies, based on your explicit consent. We seek explicit consent only where legally required. We do not rely on consent where another lawful basis for processing applies.

11. Data relating to criminal convictions and offences

We process personal data relating to criminal convictions and offences only where permitted or required by applicable law.

For example, we process criminal record information:

- as part of our pre-employment and periodic background check procedures;
- in connection with annual certification or compliance processes;
- in connection with correspondence received from, or reporting to, law enforcement; regulatory, or governmental authorities; or
- in the course of managing our relationship with you

in each case where such processing is permitted or required by applicable law.

This may include circumstances where Everest Group has a legal or regulatory obligation to report offences or where applicable law permits such processing for employment, compliance, security, fraud prevention, or regulatory purposes.

12. Mandatory data

Where we ask you to provide personal data on a mandatory basis, we will inform you of this at the time of collection. This includes situations where the information is required:

- to comply with legal obligations,
- to fulfil contractual requirements, or
- to carry out essential operational or HR processes related to your recruitment, employment, or engagement with Everest Group.

If you do not provide mandatory information, we may be unable to carry out certain HR-related activities. For example, if you do not provide bank details, we may not be able to process your salary payments. In some circumstances, failure to provide mandatory information may affect Everest Group's ability to administer your employment or engagement, including payment, benefits, workplace access, legal compliance, or other related processes.

13. Processing based on consent

Where required by applicable law, Everest Group may seek your consent to certain processing activities where no other lawful basis applies.

Where consent is relied upon, you may withdraw your consent at any time by contacting privacy@everestgrp.com. Withdrawal of consent will not affect the lawfulness of processing carried out before consent was withdrawn.

Where applicable, additional information regarding the relevant processing activity will be provided at the time consent is requested.

In certain jurisdictions or circumstances, Everest Group may separately request consent or provide opt-out mechanisms for the use of photographs, recordings, promotional materials, or similar public-facing content involving employees or contractors.

14. How we share your data

Within Everest Group, your personal data may be accessed or disclosed internally, including to:

- i. local, regional, and global HR, including managers and relevant team members;

- ii. local, regional, and executive management responsible for managing or making decisions in connection with your relationship with Everest Group or when involved in an HR process concerning your relationship with Everest Group (including employees and workers from Compliance, Legal, Operations, and Information Security);
- iii. local and regional support services (such as travel bookings and other support services) and personal assistants;
- iv. system and application administrators responsible for managing access to Everest Group platforms; and
- v. other internal teams (e.g., Finance, IT, Payroll, Legal, Risk, HR) where required for specific business processes, data maintenance, security monitoring, or policy enforcement.

Certain basic professional profile data, such as your name, location, job title, contact information, skills, experience summaries, or organizational profile information may also be visible or accessible to other Everest Group employees or workers through internal systems or collaboration platforms.

Your personal data may also be accessed by authorized third party service providers engaged by Everest Group to deliver operational support, including:

- vendors hosting or maintaining our HR systems, recruitment platforms, background check tools, payroll and benefits systems, and internal productivity tools (e.g., enterprise AI platforms, survey platforms, talent review tools);
- health-related service providers (e.g., health insurance provider, online medical care and consultation provider); and
- Employer of Record (EOR), payroll, workforce management, or global employment service providers supporting Everest Group's employment, payroll, benefits, compliance, or workforce administration activities.

Personal data may be processed through integrated HR, payroll, benefits, performance management, and other operational systems, including by service providers, their affiliates, and subprocessors supporting those systems where necessary to provide related services.

Due to the size and complexity of Everest Group's operations, it is not possible to name each of our data recipients in this notice. However, typical third parties with whom we may share your data include:

- Everest Group's clients,
- External vendors (e.g., payroll, tax, legal, HR platforms),
- Local and global tax authorities or regulatory bodies,
- Bankers, insurers, background check providers, external auditors, legal counsel, and consultants, and
- business partners, industry organizations, analyst relations platforms, collaboration platforms, or other third-party service providers supporting Everest Group operations.

Where third parties process personal data on Everest Group's behalf, they do so subject to appropriate data protection, confidentiality, and security obligations. Personal data is shared only to the extent reasonably necessary for the provision of such services.

In addition, we may share personal data with national authorities or regulators in order to comply with a legal obligation or regulatory requirement to which we are subject. We may also disclose or transfer your personal data in the event of a re-organization, merger, sale, joint venture, assignment, or other transfer or disposition of all or any portion of our business.

15. How we secure your data

Everest Group is committed to protecting the security of the personal data you share with us. In support of this commitment, we use generally accepted standards of technical, administrative, and organizational safeguards to secure your personal data from unauthorized access, use, disclosure, alteration, or destruction.

Access to personal data is restricted on a role-based, need-to-know basis. Only authorized personnel of Everest Group or Everest Group Affiliates and our third-party service providers are permitted to access personal data.

Where personal data is processed through digital tools, HR platforms, or enterprise systems (including those using AI-assisted functionality), Everest Group implements reasonable technical and administrative safeguards designed to protect personal data and support the detection and response to unauthorized access, misuse, or security incidents.

Despite these precautions, we cannot guarantee that unauthorized persons will not obtain access to your personal data. However, Everest Group maintains incident detection and response protocols, and it regularly reviews and updates its security practices to address evolving risks.

16. International transfer of your data

As Everest Group operates globally, your personal data may be accessed, processed, or transferred to countries outside the country in which it was originally collected, including countries where Everest Group, its Affiliates, service providers, or business partners operate.

Where personal data is transferred internationally, Everest Group takes appropriate steps to ensure that such transfers comply with applicable data protection laws and that appropriate safeguards are implemented to protect personal data.

Where required by applicable law, Everest Group relies on the European Commission's Standard Contractual Clauses (SCCs), the UK International Data Transfer Agreement (IDTA), or other applicable transfer mechanisms to govern international transfers of personal data from the EEA or the UK.

You may request additional information regarding applicable transfer safeguards by contacting privacy@everestgrp.com.

17. Your rights

- i. **Data subject rights.** Subject to applicable data protection laws and certain limitations or exceptions, you may be entitled to the following rights in respect of your personal data:
 - a. **Information and access:** You may have the right to be provided with certain information about Everest Group's processing of your personal data and access to that data (subject to exceptions).
 - b. **Rectification:** If your personal data changes, we encourage you to inform us of the change. You may have the right to require inaccurate or incomplete personal data to be updated or corrected.

- c. **Erasure:** You may have the right to require that your data be erased in certain circumstances, including where it is no longer necessary for us to process this data in relation to the purposes for which we collected or processed the data, or if we processed this data on the basis of your consent and you have since withdrawn this consent.
- d. **Data portability:** Where we process your personal data on the basis of your consent, or where such processing is necessary for entering into or performing our obligations under a contract with you, you may have the right to have the data transferred to you or another controller in a structured, commonly used and machine-readable format, where this is technically feasible.
- e. **Right to object to certain data processing:** To the extent that Everest Group relies upon the legal basis of legitimate interests to process your personal data, you may have the right to object to such processing, including on grounds relating to your particular situation, and, if such right exists, Everest Group must stop such processing unless we can either demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms or where processing is necessary for the establishment, exercise, or defence of legal rights and claims.
- f. **Right to restriction of processing:** You have the right to restrict Everest Group's processing of your personal data while your request for data rectification or objection to personal data processing is being considered, if we no longer need to process your data but you need that data in connection with a legal claim, or if our processing is unlawful but you do not want us to erase the data. If this right applies, we will continue to store your data but will only further process it with your consent, for the establishment and exercise of legal rights or defence of legal claims, to protect the rights of another person, or for reasons of important public interest.
- g. **Right to withdraw consent:** To the extent that Everest Group is relying upon your consent to process personal data, you may have the right to withdraw such consent at any time. Withdrawal of consent will not affect the lawfulness of processing carried out before consent was withdrawn.
- h. **Complaint rights:** Subject to applicable law, you may have the right to lodge a complaint with a supervisory authority, regulator, or data protection authority in your Member State of residence, where applicable. UK-based individuals may lodge a complaint with the Information Commissioner's Office (ICO) at ico.org.uk.

18. How can you exercise your rights?

If you would like to exercise your data protection rights regarding your personal data, you can do so by:

- completing our form at www.everestgrp.com/privacy-notice/data-rights
- emailing your request to us at: privacy@everestgrp.com. Please include your full name, email address, and a detailed description of your request
- contacting us by postal mail at:

Everest Global Inc.
Legal Department (Attention: Privacy)
700 Central Expy S, Suite 400
Allen, TX 75013

Upon receipt of your request to exercise your data protection rights, we may take reasonable steps to verify your identity before acting on certain data protection rights, in accordance with applicable law. If you are using an authorized agent to exercise your data protection rights and that agent does not provide a power of attorney with the initial request, we may request further evidence of the agent's right to act on your behalf, including valid written authorization or by contacting you to verify the request. If we believe exceptions apply, we will respond to your request to the extent we are able to do so, and we will provide an explanation of the basis for not complying wholly or partially with your request.

Please note that Everest Group does not discriminate against those who exercise their rights under applicable data protection laws. This means that Everest Group will not deny services, take adverse employment action, or otherwise penalize any individual for exercising their data protection or privacy rights in good faith. Where a right is exercised and Everest Group determines that an exception or limitation applies under applicable law, Everest Group will communicate the basis for that determination in accordance with its obligations under applicable law.

19. Use of Artificial Intelligence (AI) and Automated Processing

Everest Group may use AI-enabled, automated, or AI-assisted tools to support business operations and internal processes, including recruitment support, employee surveys, performance feedback, knowledge transfer, client management, operational efficiency, productivity enhancement, and monitoring activities described in this Notice.

These tools may analyze business communications, user inputs, or operational data in order to generate summaries, recommendations, insights, or administrative support outputs. Such tools are designed to assist human decision-making and are not used to make solely automated decisions that produce legal or similarly significant effects on individuals.

You may contact privacy@everestgrp.com for additional information regarding Everest Group's use of AI-enabled tools and related processing activities.

20. How long we retain your data

Everest Group and Everest Group Affiliates retain personal data for varying periods of time depending on the nature of the data, the purposes for which it was collected, applicable legal or regulatory requirements, and legitimate business needs.

In general, personal data will be retained for the duration of your application process, employment, engagement, or other relationship with Everest Group, and for a period thereafter determined by reference to the following criteria: (i) the length of time required to comply with applicable legal, tax, accounting, employment, payroll, regulatory, and reporting obligations in the relevant jurisdiction; (ii) the applicable statutory limitation periods for legal claims that may arise from the employment or engagement relationship; (iii) the period necessary to respond to inquiries, complaints, or disputes; (iv) the period necessary to administer ongoing compensation, benefits, pension, or related obligations; and (v) the period reasonably required to maintain appropriate business and employment records consistent with legitimate operational needs. Where specific retention periods are prescribed by applicable law (for example, tax or payroll records are typically required to be retained for six to seven years in many jurisdictions, and certain health and safety records may be subject to longer statutory retention periods), Everest Group will retain personal data for at least those minimum periods.

If you are not selected for employment, Everest Group may retain your application materials and related personal data for a limited period for recruitment administration, internal recordkeeping, legal

compliance, and consideration for future opportunities, unless you object where such right applies under applicable law.

Where Everest Group processes personal data, including sensitive/special category personal data, in connection with workplace safety, health, legal, or regulatory obligations, such data may be retained for the period necessary to satisfy those obligations and to demonstrate compliance with applicable law.

Where consent is required by applicable law for retention or future recruitment communications, you may withdraw your consent at any time by contacting privacy@everestgrp.com.

21. Jurisdiction specific notices and availability of this Privacy Notice in other languages

India – Digital Personal Data Protection Act, 2023 (DPDP Act)

This section applies to individuals employed by, engaged by, or applying to Everest Business Advisory India Private Limited, which acts as the Data Fiduciary (as defined under the DPDP Act) for personal data processed in India in connection with employment, engagement, or recruitment.

Rights of Data Principals (India): Under the DPDP Act, you (as a Data Principal) have the following rights, subject to the conditions and limitations set out in the DPDP Act and applicable rules:

- (a) Right to access information: You have the right to obtain a summary of the personal data being processed and the processing activities undertaken by Everest Group in respect of your personal data.
- (b) Right to correction and erasure: You have the right to request correction of inaccurate or incomplete personal data and the right to request erasure of personal data that is no longer necessary for the purpose for which it was collected, subject to any legal or regulatory retention obligations applicable to Everest Group.
- (c) Right to grievance redressal: You have the right to have any grievance relating to the processing of your personal data addressed by Everest Group in a timely manner. Grievances may be submitted to the Grievance Officer identified below.
- (d) Right to nominate: You have the right to nominate another individual who shall, in the event of your death or incapacity, exercise your rights as a Data Principal under the DPDP Act.

Grievances (India): In accordance with the DPDP Act and applicable rules, Grievances must be acknowledged within a reasonable period of receipt and resolved in accordance with the timelines prescribed under applicable law. You may contact the Grievance Officer at: privacy@everestgrp.com. If your grievance is not resolved to your satisfaction, you may escalate the matter to the Data Protection Board of India.

California – California Privacy Rights Act (CPRA)

This section applies to individuals who are residents of California, USA. Everest Group does not sell your personal information, as that term is defined under the CPRA. Everest Group does not share personal information for cross-context behavioural advertising purposes.

California residents have the following rights under the CPRA, subject to applicable exceptions and verification requirements: (a) the right to know the categories and specific pieces of personal

information collected, the purposes for collection, and the categories of third parties with whom personal information is shared; (b) the right to delete personal information, subject to certain exceptions; (c) the right to correct inaccurate personal information; (d) the right to limit the use and disclosure of sensitive personal information to uses reasonably necessary to provide the services or as otherwise permitted by the CPRA; (e) the right to opt out of the sale or sharing of personal information (Everest Group does not engage in such activities in respect of employee, contractor, or applicant personal data); and (f) the right to non-discrimination for exercising CPRA rights.

To exercise your rights as a California resident, please use the contact methods set out in Section 18 of this Notice.

Canada – PIPEDA and Provincial Privacy Laws

This section applies to individuals employed by, engaged by, or applying to Everest Outsourcing Canada Co. The collection, use, and disclosure of personal information in Canada is governed by the Personal Information Protection and Electronic Documents Act (PIPEDA) and, where applicable, provincial privacy legislation.

Canadian residents have rights with respect to their personal information under applicable law, including the right to access personal information held about them, the right to request correction of inaccurate information, and the right to withdraw consent to certain processing activities, subject to applicable legal and contractual restrictions.

Where personal information is transferred outside Canada, including to Everest Group affiliates or service providers, Everest Group implements contractual or other appropriate protections to provide a comparable level of protection to the personal information as required under applicable Canadian law. To exercise your rights or for questions about the handling of your personal information, please contact privacy@everestgrp.com. Individuals may also contact the Office of the Privacy Commissioner of Canada.

This Privacy Notice is currently provided in English. Where required by applicable law or reasonably practicable, Everest Group may make translated versions of this Notice available in other languages upon request.

Requests regarding translated versions of this Notice may be directed to privacy@everestgrp.com.

22. Changes to our privacy notice

Everest Group may update or modify this Privacy Notice from time to time to reflect changes in our business operations, processing activities, technologies, legal obligations, or applicable law. The “Last Updated” date at the top of this Notice reflects the date of the most recent revision. We encourage you to review this Notice periodically to stay informed about how we process your personal data.

Appendix 1 – Everest Group Controller entities

Everest Global, Inc. (US)

Everest Group Consulting Limited (UK)

Everest Business Advisory India Private Limited (India)

Everest Outsourcing Canada Co. (Canada)

