

## Data Protection Notice – Employee and Applicant Personal Information

From: General Dynamics Information Technology, Inc. and  
its Jamaican managed affiliate CSRA Consular Services Inc.

To: Employees of CSRA Consular Services Inc.

**General Dynamics Information Technology, Inc. and its managed affiliate CSRA Consular Services Inc.** (the "**Company**" or "**we,**" "**us**") has prepared this Employee data protection notice (the "**Notice**") to describe its practices regarding the collection, use, storage, transfer and other processing of personal information—individually identifiable information—about Employees. The Company is the controller responsible for the personal information that we collect and process as described in this Notice. For the purposes of this Notice, "**Employee**" means:

- Past and present employees;
- Job applicants;
- Past and present temporary employees; and
- Past and present directors and officers.

### 1. Information we collect

We may collect your personal information from a variety of sources, including information we collect from you directly (e.g. when you apply for a job, during your employment, following termination of employment, etc.), and information we collect about you from other sources (where permitted by law).

Certain personal information is required as a consequence of the contractual relationship we have with you when we employ you, to enable us to carry out our contractual obligations to you. Failure to provide this information may prevent or delay the fulfilment of these obligations.

#### 1.1 Information we collect directly from you

The categories of information that we may collect from applicants for employment includes information regarding current and past employment such as hire date, work address, CEP number, days and hours of work and monthly salary.

The categories of information that we may collect directly from you if you commence employment with us include the following:

- (a) personal details (e.g. name, age, date of birth);
- (b) contact details (e.g. phone number, email address, postal address);
- (c) family contact personal details (e.g. emergency contact details);

- (d) other information about you and your family (e.g. gender, marital status, family status, dietary requirements, hobbies);
- (e) educational and career background (e.g. your curriculum vitae);
- (f) employment details (e.g. employee number, career planning reports, annual review reports, job start date, job end date);
- (g) employment and salary administration (e.g. salary amount, bank details, benefit details);
- (h) other relevant data in respect of your job application or employment with us or members of our Group (e.g. job location, working conditions, special leave, special needs, holidays, etc.); and
- (i) data regarding special agreements (e.g. study allowances, guarantees for mortgage loans, health insurance allowances, etc.).

## 2. How we use your personal information and the basis on which we use it

We use your personal information in relation to your job application and (current or past) employment with us, to:

- (a) carry out our obligations to you under your employment contract;
- (b) exercise our rights under your employment contract;
- (c) provide any services you request from us;
- (d) to keep our records accurate and up-to-date; and
- (e) comply with legal obligations to which we are subject.

## 3. Special categories of personal information

We collect and process certain special categories of personal information about Employees where necessary and in compliance with applicable local data protection law. In particular, the Company processes health data as required and to the extent permitted under local laws to carry out its obligations in the field of employment, health and safety, social security and social obligations law and, where necessary, for the establishment or defence of legal claims.

## 4. How we store personal information and who can access it

The Company maintains an automated record of each Employee's personal information. This automated record contains most of the data held in the Employee's personnel file. Additionally, the Company maintains personal information in various human resources applications, including applications for payroll, benefits, talent management and performance management. The

Company may maintain individual hard-copy personnel files. The Human Resources Department maintains these files in a secure environment.

Access to personal information is restricted to those individuals who need such access for the purposes listed above or where required by law, including members of the Human Resources Department, the managers in the Employee's line of business, and to authorised representatives of the Company's internal control functions such as Compliance and Legal. Access may also be granted on a strict need-to-know basis to other managers in the Company where relevant if the Employee is being considered for an alternative job opportunity, or if a new manager appointed in the line of business needs to review files. All Employees, including managers, are bound by the requirement of this Notice.

## 5. Your rights over your personal information

Please let us know if any of the personal information that we hold about you changes so that we can correct and update the information on our systems.

You can view, delete, correct or update the personal information you provide to us by contacting the GDIT Privacy Office ([privacy@GDIT.com](mailto:privacy@GDIT.com)) or Donald P. Creston, 3150 Fairview Park Drive Falls Church VA 22042 [Donald.Creston@gdit.com](mailto:Donald.Creston@gdit.com).

In certain circumstances you may object to specific processing activities, require us to restrict how we process your personal information and ask us to share your personal information in a usable format with another company. Where you have given your consent to a particular type of processing, you may withdraw that consent at any time.

To exercise any of the above rights, please contact us using the contact details set out below.

## 6. Information Sharing

In general, we do not share your personal information with third parties (other than service providers acting on our behalf) unless we have a lawful basis for doing so.

We rely on third-party service providers to perform a variety of services on our behalf, which may mean that we have to share your personal information with these third parties. When we share your personal information in this way, we put in place appropriate measures to make sure that our service providers keep your personal information secure.

Other situations in which we may disclose your personal information to a third party, are:

- (a) in the course of a sale or an acquisition of a company or other entity;
- (b) where permitted by law, to protect and defend our rights and property; and
- (c) when required by law, and/or public authorities.

## 7. Information Security

We have implemented generally accepted standards of technology and operational security to protect personal information from loss, misuse, alteration or destruction. We require Employees and principals to keep personal information confidential and provide access to this information only to authorised personnel.

We will retain your personal information in accordance with our data retention policy which sets out data retention periods required or permitted by applicable law.

## 8. Information Transfer

Your personal information may be transferred to, stored, and processed in a country other than the one in which it was provided. When we do so, we guarantee compliance with the principles and rights of the data subject and the regime of data protection provided in the Jamaica Data Protection Act, 2020.

## 9. Dependent's Privacy

We may process personal information of your family members, including your children. When we do so, it will do so in compliance with data protection laws as they apply to children.

## 10. Contact Us

If you have questions or concerns regarding the way in which your personal information has been used, please contact: GDIT Privacy Office ([privacy@GDIT.com](mailto:privacy@GDIT.com)) or Donald P. Creston, 3150 Fairview Park Drive Falls Church VA 22042, [Donald.Creston@gdit.com](mailto:Donald.Creston@gdit.com).

## 11. Changes to the Privacy Notice

You may request a copy of this privacy notice from us using the contact details set out above. We may modify or update this privacy notice from time to time. You will be able to see when we last updated the privacy notice because we will include a revision date. Changes and additions to this privacy notice are effective from the date on which they are posted. Please review this privacy notice from time to time to check whether we have made any changes to the way in which we use your personal information.]

Employee's Acknowledgment

I have read the Employee and Applicant Data Protection Notice. I understand its contents and acknowledge the application of its terms including those regarding the collection, processing and use of my personal information and special categories of personal information by the Company, and the international transfer of my personal information and special categories of personal information to jurisdictions where data protection laws may not provide an equivalent level of protection to the laws of my home jurisdiction.

I also confirm that I have duly provided my dependents (if any) with all information regarding the processing of their personal information including special categories of personal information and their related rights, as described in the Notice and that I have obtained the explicit consent of those individuals, where necessary, to the processing of their personal information including special categories of personal information.

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Date: