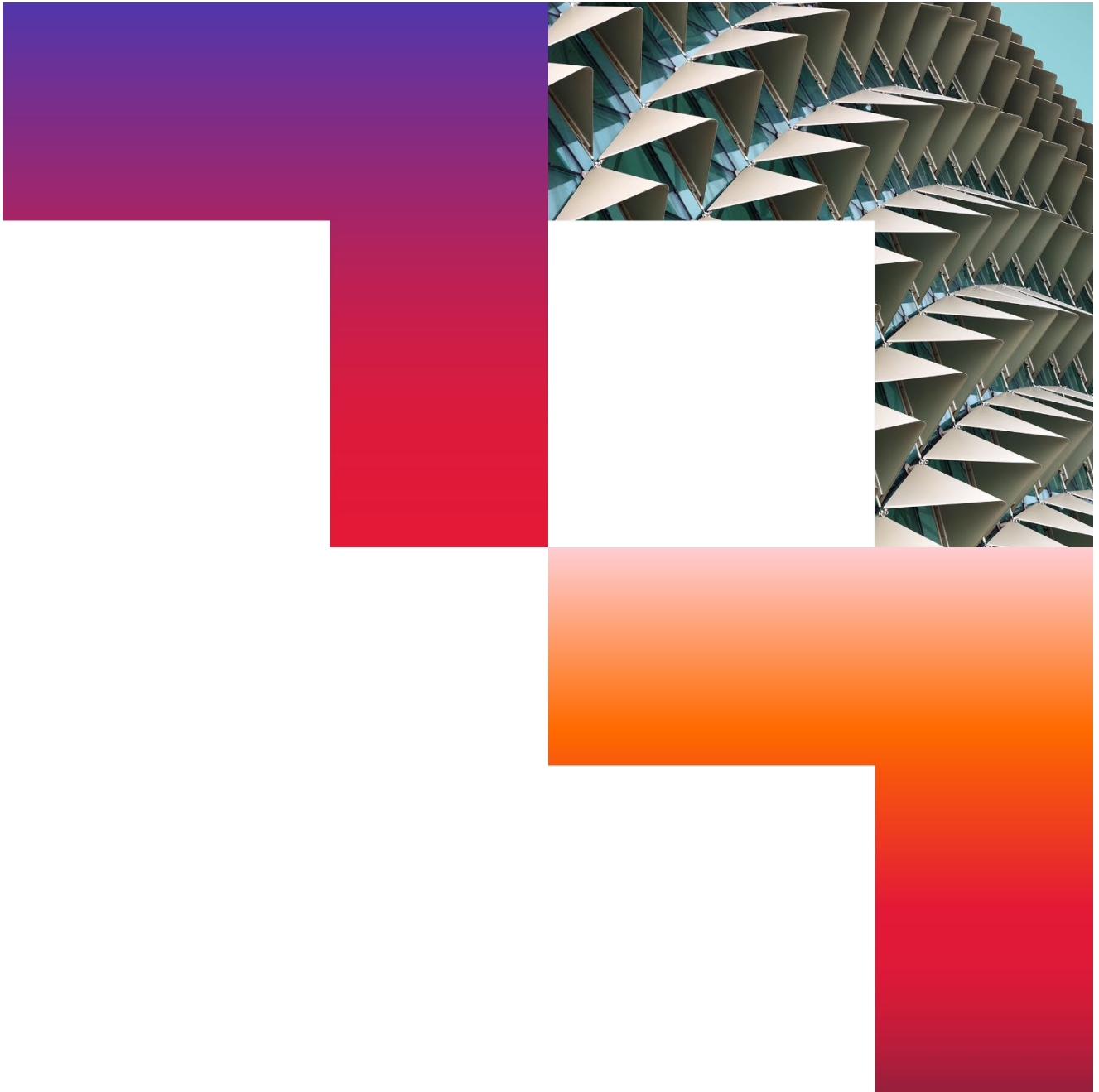




BCR C – CGI – Appendix E CGI Privacy Training Program

CGI

Protecting Personal Data is not only a CGI core value but also a matter of compliance with privacy laws. In this context, fostering a privacy culture within the company is essential to make all CGI Partners accountable for the protection of Personal Data Processed as part of CGI's operations.

To raise awareness of data privacy and records management and ensure comprehensive privacy compliance across CGI's organization, CGI established a Privacy Training Program. CGI Partners that have permanent or regular access to Personal Data that are involved in the collection of Personal Data or in the development of tools used to Process Personal Data will complete the relevant **Data Privacy Training Program module**. This training will enable them to keep up to date with applicable obligations when Processing the Personal Data of CGI Partners, clients or third parties (e.g. prospects, vendors, visitors, etc.).

CGI's Privacy Training Program includes the following components available on CGI learning platform:

- Module 1 is the **general training** on data privacy and records management fundamentals and targets all new joiners regardless of their roles, and any associated annual updates (45-minute e-learning with an assessment) to be completed by all CGI Partners. The general training as well as the annual updates are mandatory.
- Modules 2 to 6 are the **specific trainings** that focus on specific privacy requirements for CGI's global operations and corporate functions whose roles require a deeper understanding of privacy requirements in order to be able to take proactive and/or reactive measures in this regard.
- Module 7 is a 3-minute video on CGI's Binding Corporate Rules and data transfer concepts.

Such trainings can be given onsite or online, as part of dedicated or joined sessions together with other corporate functions such as Enterprise Security, Corporate Legal or Quality or during CGI's committees.

Please note that definitions for specific terms within this document can be found in CGI's Data Privacy Policy.

I. GENERAL PRIVACY TRAINING

CGI as an **employer** taking care about CGI Partners: the following roles are involved in to ensure the appropriate protection of Personal Data:

- SBU/BU leadership, so that they understand their responsibilities and ensure compliance;
- Any roles that Process CGI Partners' data in their activities, so that they understand their responsibilities and know what they can and cannot do. As an example:
 - HR - including resourcing and recruitment - and Finance
 - Marketing and communications, including Business Development
- Any roles that help the organization understand and implement its responsibilities, so that they can advise and support appropriately. As an example:
 - Legal
 - Security
 - CIO/IS-IT
- CGI Partners, so that they understand their data privacy rights.

CGI as an **IT company** delivering services to its clients: the following roles are involved in to ensure the appropriate protection of Personal Data:

- SBU/BU leadership, so that they understand their responsibilities and ensure compliance;

- Engagement Managers/PMS (in effect all Director and VP roles), so that they understand and ensure that data privacy regulations are applied when delivering services to clients;
- Any roles involved in the design or development of new services, solutions or software, so that they understand and can apply what is required to “design in” data privacy to everything that CGI offers to clients, e.g. solution designers, software developers, architects;
- Any roles involved in the Sales/Bid cycle, so that they understand the requirements and implications of data privacy requirements, e.g. Opportunity Pursuit Leads, business developers, business engineers, including Marketing and communications;
- Any roles involved in the ongoing delivery of services and solutions to clients, so that they understand what they must do/not do to ensure CGI’s compliance to data privacy regulations, e.g. any technical support roles including network, server, and software support, Procurement, Project Office;
- Any roles that help the organization understand and implement its responsibilities, so that they can advise and support appropriately, e.g. Quality assurance (EAS), Legal, CIO, Enterprise Security, Audit Services.

The program’s general training module is designed for all CGI Partners, regardless of their role within CGI.

General training – Data Privacy and Records Management Fundamentals

- Key data privacy and records management concepts embedded in CGI’s Data Privacy Policy and CGI’s Records Retention Policy.
- Standard rules and best practices to follow when Processing Personal Data
- Key obligations CGI Partners must be aware of when Processing Personal Data (e.g., information of Data Subjects, data retention limitation, data deletion, restrictions on data transfers, procedures of managing requests for access to Personal Data by public authorities, etc.)
- Awareness of BCRs

II. SPECIFIC PRIVACY TRAININGS

These specific trainings are designed for CGI Partners who have day-to-day responsibilities that involve the Processing of Personal Data. CGI Partners must enroll in one of the modules below according to their roles. The content of the modules may evolve from time to time to take into account changes in technology, privacy laws, and guidance from privacy regulators or to reflect CGI internal reorganizations (merger and acquisition, domain changes, etc.).

Module 2 – Privacy training for CGI Partners dealing with HR and financial matters

- Types of Personal Data that can be collected for applicants, permanent and temporary employees, leavers, subcontractors and freelancers
- Information notice requirements for Data Subjects
- Handling Data Subjects access requests and complaints about data protection
- Legal requirements when sending Personal Data in countries outside of EEA
- Data Subject rights in requesting the deletion and/or restitution of their CGI Personal Data

Module 3 – Privacy training for CGI Partners dealing with marketing/communication matters

- Different aspects related to the definition of “consent” under CGI’s Data Privacy Policy and when and how consent should be obtained from clients for marketing purposes
- Types of Personal Data related to clients that can be collected
- Handling client access requests and complaints related to data protection

Module 4 – Privacy training for CGI Partners dealing with project/service (internal)

- Concepts of privacy by design and privacy by default
- Requirements of CGI’s Data Privacy Policy with respect to subcontracting (suppliers, subcontractors)
- When and how to conduct a privacy impact assessment
- Principle of “accountability” and the type of information that needs to be included in records for Processing activities under CGI’s responsibility
- Applicable rules Personal Data breaches and how to handle such incidents (notification to the Supervisory Authority, communication to the Data Subjects, Clients etc.)
- Privacy rules in the context of innovative technology projects (e.g., big data, cognitive technologies, IoT, etc.)
- Use of CGI’s Data Privacy Policy and Processes in the context of negotiations
- Standard privacy contractual requirements to be imposed by CGI on suppliers and subcontractors (where possible)
- Extent to which standard clauses adopted by CGI could be amended during negotiations
- Applicable rules for Personal Data breaches and how to handle such incidents

Module 5 – Privacy training for CGI Partners dealing with project/service (client)

- Concepts of privacy by design and privacy by default
- Requirements of CGI’s Data Privacy Policy with respect to subcontracting (suppliers, subcontractors)
- When and how to conduct a privacy impact assessment
- Key privacy points to be aware of as part of RFPs
- Principle of “accountability” and the type of information that needs to be included in records for Processing activities under CGI’s responsibility
- Applicable rules Personal Data breaches and how to handle such incidents (notification to the Supervisory Authority, communication to the Data Subjects, Clients etc.)

- Privacy rules in the context of innovative technology projects (e.g., big data, cognitive technologies, IoT, etc.)
- Use of CGI's Data Privacy Policy and Processes in the context of negotiations
- Standard privacy contractual requirements to be imposed by CGI on suppliers, subcontractors and clients (where possible)
- Extent to which standard clauses adopted by CGI could be amended during negotiations
- Applicable rules for Personal Data breaches and how to handle such incidents

Module 6 – Privacy training regarding Privacy by Design

- Guidance regarding privacy by design and privacy by default
- Guidance regarding deletion and/or restitution of Data Subject's Personal Data
- Guidance regarding the performance of privacy assessments
- Obligation of CGI to set in place appropriate technical measures to ensure the security of Personal Data collected

III. REVISION HISTORY

Version	Date	Description
1.0		Initial version V1.0
1.1	01.2020	Reviewed – minor textual changes
1.2	03.2021	Title change Chief Data Protection Officer to Chief Privacy Officer
1.3	11-2022	Annual Review – No changes
1.4	03-2025	Annual Review – minor textual changes; changes to reflect updates in the internal processes; changes to align with new EDPB BCR-C recommendations 1/2022 adopted on 20 June 2023
1.5	06-2025	Annual review – No changes

IV. QUESTIONS AND COMMENTS

Should you have any questions, comments or suggestions regarding the content of this document, please send them to privacy@cgi.com.

