Data Privacy at Wipro

The Spirit of Wipro

Be passionate about clients' success

Treat each person with respect

Be global and responsible

Unyielding integrity in everything we do

Data Privacy at Wipro

Preamble

At Wipro, Privacy is at the heart of everything we do. Alongside data protection, Wipro's Data Privacy Framework addresses the imbalance of power between the data subject (the individual) and the digital ecosystem by establishing rules about the collection, storage, and sharing of personal information. Privacy and data protection law is generally technology neutral and interacts with sector or technology-related legislation, such as AI. We are aligned with the generally accepted privacy laws across the globe including GDPR, CCPA, PIPEDA, PIPL, Digital Personal Data Protection Act 2023 etc. for governance of personal data collected and processed by us. Wipro aims at protecting the individual's privacy by empowering them with rights over the manner in which their data is processed. Wipro is affiliated with ISO 27701 and ISO 27018 standards, which provide assurances for data privacy compliance along with cloud security, information security, physical security, and business continuity, has certified Wipro's IT infrastructure.

Scope

Primary Stakeholders: The aspects of personal data processing within the organization applies, to both internal operations and client-facing services. This document further extends to all Wipro employees, contractors, vendors, and partners involved in handling personal data.

Geographies: Global

Statement of Wipro's vision and key goals

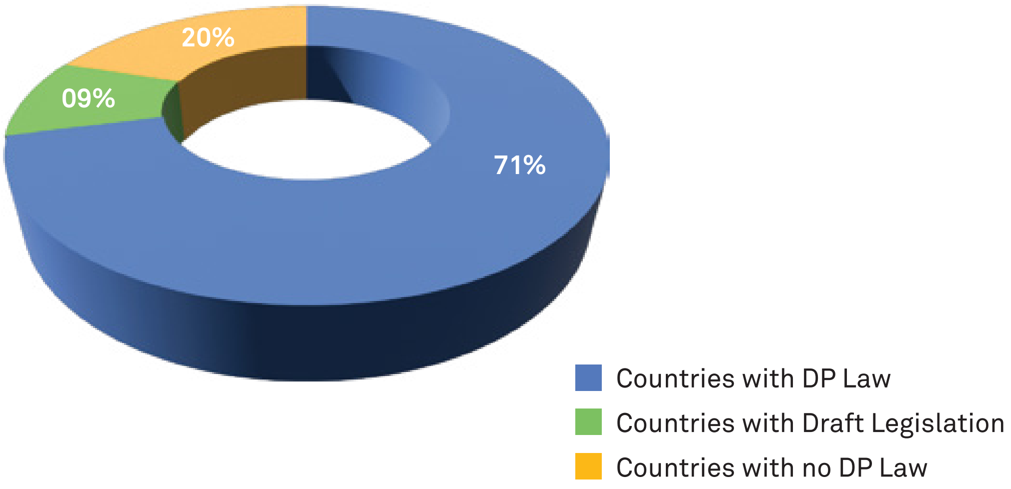
Wipro is committed to upholding the highest standards of data privacy and protection in alignment with global privacy principles and regulations. Our key goals include fostering a robust privacy culture, ensuring compliance with applicable laws, protecting personal data from unauthorized access, and promoting transparency and accountability in all data processing activities.

Approach

Privacy is recognized as a fundamental right in many jurisdictions, and Wipro acknowledges the importance of data protection in maintaining trust with stakeholders. Our enterprise-wide Data Privacy Framework integrates various governance mechanisms to ensure agile compliance with international regulatory requirements and evolving customer expectations.

Wipro's Data Privacy Office proactively implements and manages Wipro's privacy portfolio to ensure compliance with privacy regulations applicable to the organization. The team supports client delivery functions and facilitates compliance with internally established privacy frameworks, integrating privacy principles and risk-based methodologies throughout the organization.

Data privacy landscape



Key Principles of Wipro Privacy program

Wipro's comprehensive privacy program and Code of Conduct are designed to meet global privacy principles, ensuring accountability, transparency, and protection of personal data throughout its lifecycle.

Privacy by Design

Wipro has a specialized "privacy by design" centre that has developed key guidelines, templates and resources to ensure "privacy by design" is maintained in various Wipro systems (both in-house and customer support). This team aims to provide teams and clients with support, knowledge, and the most efficient PET (Privacy Enhancing Technologies) solutions.

Privacy Impact Assessments (PIAs) are a key tenet of Privacy by Design so that privacy is not an afterthought but part of the design of a product.

Wipro's Privacy by Design Centre supports privacy implementation at the tactical and operational levels, and is essential in minimizing privacy and security risks, which helps in building trust and increase transparency with the data subjects and stakeholders. This team ensures that the PIA are performed in the early stages of the project's lifecycle and that the identified risks are addressed early to avoid unnecessary implications on the cost or the budget of the project. The risks thus identified and fixed aid in training purposes for the broader audience within Wipro.

These steps increase the likelihood of compliance with the applicable privacy regulations and minimize the chances of privacy intrusion that may negatively affect the data subjects and stakeholders. The risk mitigation efforts are also used for training purposes throughout Wipro to ensure our teams are keeping up with advancements in the field of data privacy.

Regulatory Compliance

Wipro understands the importance of the ever-evolving regulatory landscape and is committed to being a leader in data privacy in terms of demonstrating compliance with all the applicable regulatory requirements. Our continuous monitoring program ensures that Wipro stays up to date on the latest happenings by not just looking only at the actual new regulations but also reviewing and anticipating any potential changes that may adversely affect Wipro. When we identify any significant developments likely to affect Wipro's operations, an analysis is sent to senior executives and key stakeholders in the respective jurisdictions, who then formulate a plan to prepare. Wipro also leverages support from external counsels and consultants to assist in some issues.

Wipro has a global footprint with a presence in over sixty-five countries. To ensure compliance with all the country-specific data privacy requirements, Wipro conducts an in-depth country compliance activity.

End-User Privacy

Wipro's Privacy Statement on the website and internal Data Protection & Privacy Policy articulate the privacy and data protection principles followed by Wipro Limited and its entities worldwide. Parties covered by these policies include customers (including products, outsourcing, and other services), partners, current and former employees, trainees, applicants, contractors, prospects, vendors, and current or former members of the Board of Directors, whose personal information are processed by Wipro.

Wipro does not share personal information about customers with affiliates, partners, service providers, group entities, and non-affiliated companies except in cases where we have the end-users consent for a legitimate purpose or when legally required to do so. Refer to Wipro Privacy Statement for more details: https://www.wipro.com/privacy-statement/

Privacy Incident Management

Wipro has a dedicated Data Privacy Team which proactively manages and implements appropriate and effective measures to ensure compliance with privacy requirements and industry standards applicable to the organization.

Wipro's Data Privacy Framework entails the integration of important aspects of data privacy (e.g. privacy principles and methodologies across the length and breadth of the organization) to strengthen privacy training and awareness within Wipro.

One of the most important aspects of Wipro's Privacy Framework is its systematic and strategic approach to managing potential privacy incidents and breaches. Privacy incidents and breaches are not only escalating in frequency along with their impact on a global scale, but the ramifications of these incidents are compounding as we move towards an increasingly connected digital society. Due to the enormity of the risks associated with such incidents, Wipro prioritizes the detection, response, and recovery processes in the highest possible manner to ensure effective and efficient management.

Wipro manages privacy incidents in a top-down approach, embedded in Wipro's overall Privacy Incident Management Framework. Wipro has industry-best solutions such as DLP to automatically detect incidents and technical vulnerabilities leading to leakages of personal data and trigger communication to all the required stakeholders.

Wipro also provides comprehensive training on privacy incident management and reporting to all employees on a stipulated frequency which encourages the employees to sincerely report any suspicious activity that could turn out to be a privacy incident. The Incident Management Team reviews the incident that is reported and validates if it is a privacy incident and engages the Data Privacy Team for support with any verified incidents. The Data Privacy Team is primarily engaged in reviewing the corrective, preventative, and remediation measures that must be deployed to address privacy incidents and prevent them from recurring. In addition to this, a specialized branch of the Data Privacy Team provides a great deal of sophistication in managing privacy incidents 24/7.

Wipro is cognizant of all the privacy incidents and related requirements arising from the applicable privacy laws and has developed processes and procedures to ensure we stay updated, implement, and comply with the same.

In the event of a privacy compliance violation or breach, Wipro shall take disciplinary actions in accordance with its internal policies and the severity of the violation. These actions may include warnings, retraining, suspension, termination of employment, or other appropriate measures.

Privacy Impact Assessments

Wipro's Data Privacy Framework advocates performing privacy impact assessments (PIAs) on all products and offerings, including but not limited to internal business-enabling functions, client-delivery engagements, shared-services platforms, products and platforms thereby ensuring a 360-degree view of all data processing activities.

PIAs are performed using a risk-based approach and follow industry-leading global standards. This methodology helps us challenge the traditional ways of managing privacy of the data through gap assessments and enable viewing data privacy from the lens of numerical risk score that are derived from carefully selected parameters like the probability of an incident that may occur or the potential financial impact of an incident. Furthermore, this methodology helps paint a comprehensive picture of the overall risk proposition for each of the elements included within.

Training & Awareness

Wipro's Data Privacy Office is constantly looking for new ways to enhance knowledge and awareness around data privacy topics and considerations across the length and breadth of the organization. Wipro takes special interest in encouraging and enhancing privacy learning and awareness throughout the organization. All employees, including contractors, must complete the mandatory privacy training to ensure that they understand key privacy concepts and principles, laws, best practices, and contractual obligations.

Training is designed to equip employees from all business lines with up-to-date information on data privacy in their respective fields. The Data Privacy Office has also developed interactive and focused training workshops, including awareness emails, podcasts, etc. that are relevant to Wipro business and are customized to cover any new developments in the privacy space.

Data Subject Requests

Wipro has an established and well-defined process to handle subject access requests related to personal data to cater to the SAR. Wipro respects every data subject's right and has a robust data subject request (DSR) program in place to address the requests from a data subject concerning their right to be informed, access, correct, request deletion or request restriction, portability, etc., as may be required under applicable law with timely resolution and highly efficient counsel support.

Cross-border Data Transfers

As a global business working with global clients, secure data sharing is a priority. We are at the forefront of the debate on data sharing. We believe our unique capabilities in privacy technology and engineering can support the safe global data handling.

We have a dedicated team to perform transfer impact assessments and support customers in this complex area.

Data Security Management

We provide our customers with unparalleled data security expertise and a full suite of security measures. Wipro's Information Security Policy is articulated in our information security management system (ISMS), which is an ISO standard to provide management direction and information security support in accordance with business requirements and relevant laws and regulations to ensure confidentiality, integrity, and availability of customer assets, information, data, and IT services.

Customer Compliance Support

Wipro's Data Privacy Team is engaged right from the time the request for proposal is made and throughout the complete sales lifecycle helping in responding to the queries and performing contract reviews. The team also helps conduct privacy assessments during onboarding and afterward, in line with the customers' privacy expectations.

Scheduled risk reviews on stipulated frequency are conducted as part of the regular compliance assessments. The Data Privacy Team requires relevant stakeholders to maintain the records of all the personal data processing activities along with all the appropriate documentation or agreement structure to maintain transparency. The team also helps in publishing Dos and Don'ts that are specific to personal data processing in processor context. The team also supports in keeping up with the ongoing regulatory requirements like Schrems II, UK IDTA, etc.

Supplier Compliance Support

Wipro takes into consideration various compliance factors that include but not limited to privacy compliance right from the vendor selection stage. The dedicated team here conducts vendor risk assessments prior to onboarding vendors into the corporate and delivery functions. Periodic reviews on vendor privacy compliance are also conducted.

Most importantly, the flow down of customer contractual obligations along with the regulatory requirements in accordance with the law of the land is executed with selected suppliers, vendors, contractors, and subcontractors.

We prioritize the privacy and data protection of our suppliers by implementing stringent measures to safeguard their sensitive information. This includes requiring suppliers to sign confidentiality agreements, restricting access to authorized personnel, employing encryption techniques for data transmission and storage, and maintaining secure IT systems. We conduct regular audits to verify compliance with data protection regulations and contractual obligations, promptly responding to any breaches to mitigate risks. Through transparent communication, training initiatives, and continuous improvement efforts, we strive to foster trust and uphold the highest standards of privacy for our suppliers' data.

Government or Law enforcement access request (Transparency Report)

Wipro has not received any government access requests so far. Wipro´s priority is to protect customers and employees' data should such a request arise. Wipro has a robust team of experts and internal SOPs to effectively handle government requests. Upon receipt of such a request, Wipro will:

- Review the request and its scope under applicable local regulations, including relevant surveillance and disclosure laws
- Carry out an assessment to determine whether the request meets criteria for lawful disclosure in line with expected proportionality tests
- Refuse requests that are overbroad, not received under valid procedure or conflict majorly with EU data protection law
- Notify customers that their data is being requested where this is permissible, unless otherwise prohibited
- Review judicial remedies available and communicate the same to clients. Our inhouse and external litigations experts are fully equipped to challenge requests that don't meet procedural requirements under Indian laws and majorly conflict with international data protection laws.
- Provide only such data which the requesting body has appropriate authority to ask for under applicable law and which is the minimum necessary to meet the disclosure request
- Invoke mutual assistance mechanism as appropriate

Outcomes and Impacts

Wipro's comprehensive approach to data privacy include increased trust and transparency with stakeholders, minimized privacy and security risks, strengthened compliance with regulations, and enhanced reputation as a trusted partner in data privacy. This approach fosters a culture of privacy awareness throughout the organization and ensures effective detection, response, and recovery from privacy incidents, ultimately providing assurance and confidence to customers regarding the handling of their personal data.

Assessments and Audits

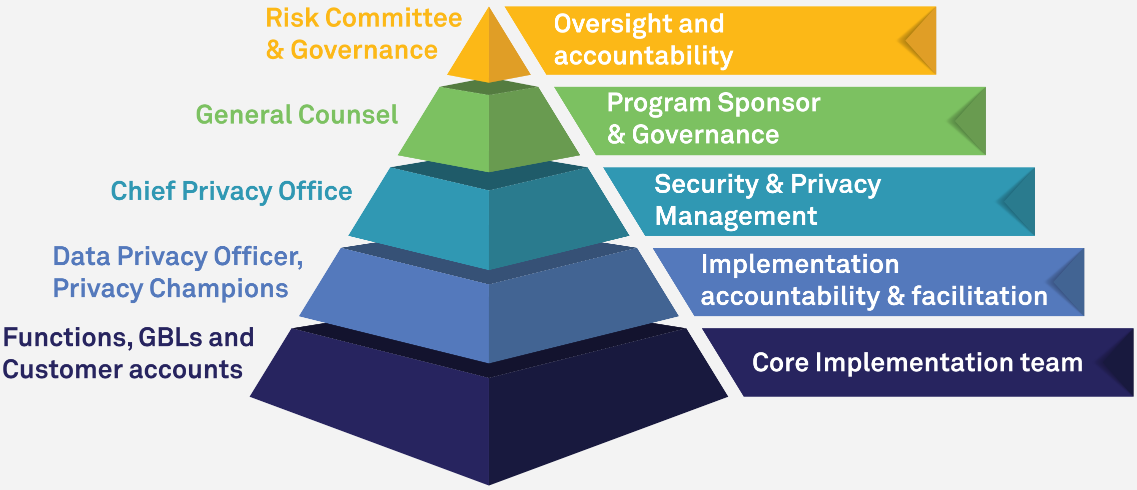
Wipro conducts internal assessments and audits to ensure compliance with its privacy policies. The assessments include, but not limited to, Country compliance activity, Data Privacy Self-Assessment. These audits are essential for evaluating the effectiveness of privacy controls, identifying any potential gaps or non-compliance issues, and implementing corrective actions as necessary. By conducting regular internal audits of privacy policy compliance, Wipro demonstrates its commitment to upholding privacy standards and regulations, as well as maintaining the trust of its clients and stakeholders. These audits may encompass various aspects of privacy, such as data handling, consent management, data security measures, and adherence to applicable privacy laws and regulations. Wipro is also engaged with third-party auditors to assess and validate its privacy compliance efforts. Third-party audits provide an independent and objective evaluation of Wipro's privacy practices, ensuring that they align with industry standards, regulatory requirements, and best practices. These audits cover a wide range of privacy-related areas, including data protection measures, consent management, privacy policies, data handling procedures, and adherence to applicable privacy laws and regulations. Wipro is certified under the ISO 27701 and ISO 27018 standards for Privacy Information Management Services including physical security & employee safety and cloud security respectively, ultimately enhancing trust and confidence among its clients and stakeholders.

Governance

Policy Owner: Global Data Privacy Team headed by the Chief Privacy Officer, who reports to the Chief Risk Officer and General Counsel.

Cadence: Wipro is dedicated to conducting annual reviews of its Data Privacy policy to ensure its relevance, effectiveness, and adherence to international standards and best practices. The outcomes of these reviews will be documented, and any essential amendments or enhancements to the policy will be promptly implemented.

Catalyst: Data Privacy Team headed by the Chief Privacy Officer, who reports to the Chief Risk Officer and General Counsel. These individuals are responsible for creating awareness, understanding, and compliance with the policy throughout the organization, driving cultural change and fostering a commitment to human rights principles at all levels.


Risk Committee & Governance
Oversight and accountability
General Counsel
Program Sponsor & Governance
Chief Privacy Office
Security & Privacy Management
Data Privacy Officer, Privacy Champions
Implementation accountability & facilitation
Functions, GBLs and Customer accounts
Core Implementation team

Risk Committee: Business Head, EU CEO, CRO, COO, CFO & CHRO
Governance Committee: General Counsel, CFO & CHRO

References Policies

This Data Privacy policy is aligned with, and complements Wipro's existing policies, standards, procedures, and guidelines related to information security management.

WIPRO's External Policies

- **Code of Business Conduct and Ethics**
- **Supplier Code of Conduct**

Approving Authority

Approved by: Ivana Bartoletti
Global Chief Privacy &
AI Governance Officer, Wipro

Effective Date: 25 June 2024

Wipro Limited
Doddakannelli
Sarjapur Road
Bengaluru – 560 035
India

Tel: +91 (80) 2844 0011
Fax: +91 (80) 2844 0256
wipro.com

Wipro Limited (NYSE: WIT, BSE: 507685, NSE: WIPRO) is a leading technology services and consulting company focused on building innovative solutions that address clients' most complex digital transformation needs.

Leveraging our holistic portfolio of capabilities in consulting, design, engineering, and operations, we help clients realize their boldest ambitions and build future-ready, sustainable businesses. With over 230,000 employees and business partners across 65 countries, we deliver on the promise of helping our clients, colleagues, and communities thrive in an ever-changing world.

For additional information, visit us at **www.wipro.com**