

VIRTUSA PRIVACY STATEMENT

Effective Date March 14, 2024

Introduction

This privacy statement (“Privacy Statement”) describes how Virtusa Corporation (“Virtusa” “us”, “we”) generally collects, uses, and shares your information. We at Virtusa, including its subsidiaries and affiliates, are strongly committed to respect your privacy. It applies to Virtusa and its affiliates, except where an affiliate presents its own statement without reference to Virtusa’s Privacy Statement.

Individuals that are residents of California should refer to the California Consumer Privacy Act of 2018 (CCPA) Supplement (“CCPA Supplement”) below.

We may provide additional supplementary privacy notices as needed.

Information We Collect and Use

At Virtusa, we value your privacy and are committed to protecting and processing your personal information (including protected health information) hereafter referred as "Personal Information". responsibly. This section describes the various types of information that we collect and how we use it.

1. Information You Provide to Virtusa

You may choose to provide us with information to receive certain services. You agree to let us use and share the information you submit for the purposes described in this Privacy Statement, or otherwise agreed to by you, including providing and customizing services, conducting our business (including for internal business operations, analytics, and to provide, develop, change, market or optimize our services and products), and to communicate and market to you directly or via third parties.

Please note that where we provide products and services as a business-to-business provider, Virtusa’s client or affiliates are responsible for the collection and use of personal information while using our products or services, unless otherwise described. If Virtusa obtains personal data as a service provider, Virtusa’s clients are also responsible for providing appropriate notice to individuals and, when applicable, obtaining any required consents.

The information you provide us and how we use it depends on the services you choose to access, or — if you are an authorized user of a product or service purchased by our client — our contract with the client, and may include:

- Name, date of birth, and demographic information (e.g., age, gender, etc.)
- Business contact information: information that you would find on a business card, such as name and email address
- Home, work and/or mobile phone number
- Home, work, billing, and/or shipping addresses

- Messages from you
- Health, prescription, pharmacy, and related information
- Insurance information
- Professional information (e.g., National Provider Number (“NPI”))

Specific situations in which you may provide us with information include but are not limited to:

- You may need to provide your name, email address, and country or region of residence to create an account to access certain services, use a product, or make a request. Your email address may be used to contact you in relation to any services to which you subscribe.
- Your business contact information may be used to contact or communicate with you about business matters. We may also use your business contact information that you provide to us, or that we collect from your organization, our business partners, or our suppliers. We may also combine your business contact information with other business- relevant information, such as information about your professional education, skills, work experience, or other publicly available information, such as business-related blogs, publications, job roles, and certifications. This information may be used to tailor our interactions with you in any part of Virtusa’s business, for example in the sales process, to maintain a relationship with you, and for post-contractual relationships.

2. Virtusa Website(s)

Our websites offer ways to communicate with you about Virtusa and its products and services. The information that we collect on our websites is used to provide you with access to the website, to operate the website, to improve your experience, and to personalize the way that information is provided to you. If you visit our websites without logging in with an account, we may still collect information that is connected to your website visit. For more information on the technologies that we use to collect website information, and setting your preferences, see the Cookies and Similar Technologies section below.

We collect information about your use of our websites, such as:

- the webpages you view
- the amount of time you spend on pages
- the website URL that referred you to our pages
- your geographic information derived from your IP address
- any hyperlinks or advertisements you select

We use this information to improve and personalize your experience with our websites, provide you with content that you may be interested in, create marketing insights, and to improve our websites, online services, and related technologies.

When you use a Virtusa website or a Virtusa online service such as “as-a-service” and desktop applications or mobile applications, we also collect the information that your browser or device automatically sends, such as:

- your browser type and IP address

- operating system, device type, and version information,
- language settings
- crash logs
- account information (if signed in with an ID)
- passwords
- use of Virtusa online services, including the pages you view, your interactions on that

page and your settings within the service.

This information is collected to:

- provide you with access to our webpages or services
- operate the service
- provide support
- personalize and improve your experience of the service
- improve the webpage view on your device and browser
- adapt to your settings and language
- adapt content for relevancy
- develop other services and technologies
- comply with applicable system and network security requirements or legal requirements.

We prepare reports on our websites to derive insights into trending topics and general market knowledge. These reports may be provided to third parties with details on how users interacted or showed interest in the third-party product or service that was presented on our websites. All reports display aggregated information and cannot be used to identify our website visitors.

We may also provide platforms and forums that enable online sharing, support, and collaboration among registered members. Any information that you submit to these platforms may be made available to others on the Internet, or removed by us, as covered in the platform privacy notice or terms. We are not responsible for any content that you make available through your use of our products or services.

Mobile application privacy notices may provide additional details about the information that is collected by the app, such as geo-location information or the unique User-ID of a device. Unique User-IDs are used to connect to servers and to connect the use of the device across apps. Depending on the functions of the app, you may be able to tailor your privacy settings by using the settings menu or in your user profile.

If Virtusa offers online education services, we may collect information on course completions to be able to provide you with credentials, certificates, or further information when needed.

We accept no responsibility for the content provided on, or privacy practices, of third-party websites or applications.

3. Marketing

Subject to your preferences, we use or may use the information that we collect directly from you, your organization to communicate with you about our products, services, and offerings. We also use this information to personalize your experience with our content and advertisements, and to develop internal marketing and business intelligence. To set or update your marketing communications preferences, you may also submit a request using the productsupport@virtusa.com or select **Unsubscribe** at the bottom of each marketing mail. To review or set your preferences regarding the information that we collect about you on our websites select **Cookie Preferences** in the website footer.

We use information that we collect for marketing purposes. This may include information:

- Collected directly from you through your interactions with Virtusa, such as attendance at events or submission of online registration forms.
- Received from third-party data providers, subject to controls confirming that the third party legally acquired the information and has the right to provide the information to Virtusa for use in our marketing communications.
- Subject to your preferences, collected on our websites or from your interactions with Virtusa emails and content (such as whether emails are opened or links selected), including content on third-party sites. For more information on the technologies that we use to collect this information, see Cookies and Similar Technologies.
- Subject to your preferences, we may use this information to market to you regarding Virtusa products, services, and offerings. For example, we may:
 - Personalize your experience with Virtusa products and services, such as sharing more relevant content or pre-filling registration forms on our websites.
 - Contact you by mail, telephone, email, or text message (including by an automatic telephone dialing system) at any of the addresses, phone numbers or other information provided by you or on your behalf in connection with your account or service, including for marketing purposes.

To opt out of the use of your hashed email for personalization or targeted advertising, you can withdraw your email consent by submitting an opt-out request or selecting Unsubscribe in each marketing email.

To review the information that we collect about you online on our products, select Cookies Policy document in the login page footer.

https://www.virtusa.com/solutions/clinical-quality-measures/terms/cookies/cookies_policy.pdf

We also use this information to develop internal marketing and business intelligence which is essential for our business operations. For example, we may:

- Combine the information collected to better understand your interests and potential business needs, such as Virtusa events you attend, content you review, or any of our websites that you visit.
- Aggregate the information that is collected about website visitors for the purposes of developing and modelling marketing audiences.
- Leverage insights from the information collected to personalize content and advertisements across multiple interactions and devices.

For more information on the technologies that we use to collect this information, and setting your preferences, see Cookies and Similar Technologies.

4. Contractual Relationships

A contractual relationship is created when you order a product or a service from us. While we mainly provide our products and services to businesses. We may collect any information that is reasonably necessary to prepare for, enter, and fulfill, the contractual agreement.

The information collected in a contractual relationship may include the business contact information of the requester, an account ID, and the order details. Information that is required for shipment and payment, for the implementation of services, or to grant access to the product or service may also be collected.

This information may be collected for various purposes, depending on the nature of the products or services, for example, for contractual management and compliance, to provide support, for the improvement or development of our products and services, to contact you for customer satisfaction surveys, and to generate technical and market insights.

5. Support Services

When you contact us to request support, we collect your contact information, problem description, and possible resolutions. We record the information that is provided to handle the support query, for administrative purposes, to foster our relationship with you, for staff training, and for quality assurance purposes.

The information that we collect may include any information exchanged during our phone conversations or provided during live chat support sessions on our websites. This may include a recording or transcript of your conversations with us. We may use this information to inform you of products or services that are related to your support request. This can include product updates or fixes, and we may combine the information that is collected through other interactions with you or your organization to provide more valuable suggestions in relation to product support, such as any available training regarding the issue.

While we handle the support case, we may have incidental access to information that you have provided or information that is on your system. This information may contain information about you, clients, client's authorized users (including client's employees) or other relevant parties. The conditions regarding the handling and processing of this information are covered by the applicable Terms of Use or other agreements between Virtusa's client(s) and Virtusa.

6. Protecting You and Virtusa

We may collect and use information to protect you and Virtusa from IT security threats and to secure the information that we hold from unauthorized access, disclosure, alteration, or destruction. This includes information from our IT access authorization systems, such as log-in information.

The security solutions we use to protect your information, our infrastructure, and our networks may collect information such as IP addresses and log files. This collection is necessary for the

functionality and utility of security programs to enable the investigation of any potential security incidents and generate insights on security threats.

We may use specialized tooling and other technical means to collect information at access points to, and in, IT systems and networks to detect unauthorized access, viruses, and indications of malicious activities. The information we collect may be used to conduct investigations when unauthorized access, malware or malicious activities are suspected, and to remove or isolate malicious code or content.

7. Virtusa Locations

When you visit a Virtusa location, we collect your name or business contact information and, in some cases, information from a government issued ID. This information is collected for access management and to protect the security and safety of our locations and employees.

The information that is collected at our locations is used to issue access badges. We may verify the identity of visitors where legally permissible and, for supplier personnel working on site, a badge with a photo identification may be requested for identification purposes.

Camera supervision and access management are used for reasons of security and safety of our locations, employees, and assets.

8. Conducting our Business Operations

We collect and use information to improve our business operations, systems, and processes. For example, information may be used to conduct, maintain, audit, and optimize our operations, to protect our assets and employees, for product development, and to defend our rights.

We collect information about our business operations to make informed decisions about the organization, the business, and to report on performance, audits, and trends. For example, we use this information to analyze the costs and quality of our operations. Where possible, this is done by using aggregated information, but it may use personal information.

We collect and use information from our business systems, which may include personal information, to:

- protect or enforce our rights, including to detect fraud or other criminal activities (for example, by using information in payment systems)
- handle and resolve disputes
- answer complaints and defend Virtusa in legal proceedings
- and comply with legal obligations in the countries where we do business

We collect information from the use of our business processes, websites, cloud and online services, products, or technologies. This information may include personal information and is used for product and process development. For example, we may use this information to increase efficiency, decrease costs, or improve services by developing automated processes and tools, or to develop or improve the technologies on which these are based.

9. Cookies and Similar Technologies

A cookie is a piece of data that a website may send to your browser, which may be stored on your computer and can be used to identify your computer. Web beacons, including pixels and tags, are technologies that are used to track a user visiting a Virtusa web page or if a web page was copied to another website. Web beacons may be used in email messages or newsletters to determine whether messages are read, forwarded, or links selected. Local Shared Objects can store content information displayed on the webpage visited, and preferences. These may be used to provide connected features across our websites or display targeted Virtusa advertising on other websites based on your interests.

Session cookies can be used to track your progression from page to page so that you are not asked for information that you have already provided during the current session, or information that is needed to be able to complete a transaction. Session cookies are erased when the web browser is closed. Persistent cookies store user preferences for successive visits to a website, such as recording your choice of language and country location. Persistent cookies erase their data within 12 months.

When you visit our websites, cloud and online services, software products, or view our content on certain third-party websites, we collect information regarding your connection by using various online tracking technologies, such as cookies, web beacons, local storage, or HTML5. Information that is collected with these technologies may be necessary to operate the website or service, to improve performance, to help us understand how our online services are used, or to determine the interests of our users. We may use advertising partners to provide and assist in the use of such technologies on Virtusa and other sites.

If a website collects cookies, a cookie management option will either presented as a notification window when you first visit a webpage or opened by selecting cookie preferences in the website footer. Virtusa's cookie manager may not address all types of tracking technologies (for example, web beacons). When using mobile apps, use the options on your mobile device to manage settings.

Blocking, disabling, or rejecting Virtusa cookies may cause services to not function properly, such as in connection with a shopping cart, or block the use of websites or Virtusa Cloud services that require you to sign in. Disabling cookies does not disable other online tracking technologies but prevents the other technologies from accessing any details stored in cookies.

Our websites may offer the possibility to use third-party social media options. If you elect to use these options, these third-party sites may log information about you, such as your IP address, access time, and referring website URLs. If you are logged in to those social media sites, they may also link collected information with your profile information. We accept no responsibility for the privacy practices of these third-party services and encourage you to review their privacy policies for more information.

For information on cookies and how to remove these technologies by using browser settings, see https://www.virtusa.com/solutions/clinical-quality-measures/terms/cookies/cookies_policy.pdf

Children

Unless otherwise indicated, our websites, products, and services are not intended for use by children under the age of 16.

How We Share Personal Information

This section describes how we share information and how we facilitate that sharing.

We may share your personal information internally and externally with suppliers, advisors, clients, or business partners for Virtusa's legitimate business purposes, and only on a need-to-know basis.

When sharing personal information, we implement appropriate checks and controls to confirm that the information can be shared.

Internal:

Personal information is shared for our legitimate business purposes, such as managing our relationship with you and other external parties, compliance programs, or systems and networks security. We do this to improve efficiency, for cost savings, and internal collaboration between our affiliates. Our internal access to personal information is restricted and granted only on a need-to-know basis. Sharing of this information is subject to the appropriate intra-Virtusa arrangements, our policies, and security standards.

External:

- Our business with third parties (including suppliers) may include the collection, use, analysis, or other types of processing of personal information on our behalf.
- Our business model includes cooperation with independent business partners for marketing, selling, and the provision of Virtusa products and services. Where appropriate, we share business contact information with selected business partners.
- We may share personal information with professional advisors, including lawyers, auditors, and insurance companies to receive their services.
- We may share contractual relationship information with others, for instance, our business partners, financial institutions, shipping companies, postal, or government authorities, such as the customs authorities that are involved in fulfillment.
- In certain circumstances, personal information may be subject to disclosure to government agencies in accordance with judicial proceedings, court orders, or legal processes. We may also share personal information to protect the rights of Virtusa or others when Virtusa believes that such rights may be affected, for example to prevent fraud.
- If we decide to sell, buy, merge, or otherwise reorganize businesses in some countries, such a transaction may involve disclosing some personal information to prospective or actual business purchasers, or the collection of personal information from those selling such businesses.

We do not sell or otherwise disclose personal information, except as described in this Privacy Statement, in a notice provided to individuals at the time of collection, or as individuals explicitly consent.

Facilitating International Transfers

When visiting Virtusa's website, you acknowledge and agree your information may be transferred to or accessed by Virtusa's affiliates and third parties in the U.S. and around the world. By providing your Personal Information, you consent to any transfer and processing in accordance with this Privacy Statement.

Virtusa complies with laws on the transfer of personal information between countries to keep your personal information protected, wherever it may be. Where information is transferred outside the EEA to a country that is not subject to an adequacy decision by the EU Commission, data is adequately protected by EU Commission approved standard contractual clauses. By choosing to visit Virtusa's website, utilize the services, or otherwise provide information to us, you agree that any dispute over privacy or the terms contained in this Privacy Statement will be governed by the law of the State of Delaware and the adjudication of any disputes arising in connection with Virtusa or its website will be in accordance with the terms.

Controller and Representative Information

Virtusa does business through its affiliates worldwide. The privacy laws in some countries consider a Controller to be the legal entity (or natural person) who defines the purposes for which the processing of personal information takes place and how that information is processed. Parties that are involved in processing operations on behalf of a Controller may be designated as Processors. Designations and associated obligations differ, depending on the jurisdiction.

Where this is relevant for the privacy laws in your country, the Controller of your personal information is Virtusa's main subsidiary in your country or region, unless Virtusa or another Virtusa subsidiary identifies itself as the Controller for a specific interaction with you.

Virtusa's corporate headquarters can be contacted at: 132 Turnpike Road, Suite 300, Southborough, MA 01772.

Information Security and Retention

To protect your personal information from unauthorized access, use, and disclosure, we implement reasonable physical, administrative, and technical safeguards. These safeguards include role-based access controls and encryption to keep personal information private while in transit. We also require our business partners, suppliers, and third parties to implement appropriate safeguards, such as contract terms and access restrictions, to protect information from unauthorized access, use, and disclosure.

We only retain personal information as long as necessary to fulfill the purposes for which it is processed, or to comply with legal and regulatory retention requirements. Legal and regulatory retention requirements may include retaining information for:

- audit and accounting purposes;
- statutory retention terms;
- the handling of disputes; and
- the establishment, exercise, or defense of legal claims in the countries where we do business.

We retain any contractual relationship information for administrative purposes, legal and regulatory retention requirements, defending Virtusa rights, and to manage Virtusa's relationship with you. The information that is provided in a supplementary privacy notice may provide more detailed information on applicable retention terms.

When personal information is no longer needed, we have processes in place to securely delete it, for example by erasing electronic files and shredding physical records.

Your Rights

You have certain rights when it comes to the handling of your personal information. The productsupport@virtusa.com can be used to:

- Request access to the personal information that we have on you, or have it updated. Depending on the applicable law, you may have additional rights concerning your personal information.
- Request to obtain your personal information in a usable format and transmit it to another party (also known as data portability). Request to delete the personal information we hold about you.
- Ask questions related to this Privacy Statement and privacy practices. Your message will be forwarded to the appropriate member of Virtusa's Privacy Management Team.
- Submit a complaint to Virtusa if you are not satisfied with how Virtusa is processing your personal information.
- Submit an opt-out request of specific personal information processing types

Your rights may be subject to limitations and exceptions resulting from applicable laws. For example, there may be situations where we cannot share certain information that you seek if disclosing this means disclosing information about others.

You may also have the right to complain to the competent supervisory authority. Contact details of Data Protection Authorities in the European Economic Area can be found [here](#), and in the UK [here](#).

Legal Basis

In some jurisdictions, the lawful handling of personal information is subject to a justification, sometimes referred to as legal basis. The legal bases that we rely on for the lawful handling of your personal information vary depending on the purpose and applicable law.

The different legal bases that we use are:

- Necessary for the performance of a contract with you. We rely on this legal basis when we need to process certain personal information, such as your contact details, payment details, and shipment details, to perform our obligations or to manage our contractual relationship with you. Examples include:
 - If you intend to purchase a product or service, we require your business contact information to enter into a contract with you or you may need to create an account ID to access a purchased product online.
 - When fulfilling a contract, you may need to receive support services, for which we will need to collect your contact information.

- Necessary for the purposes of Virtusa's or a third party's legitimate interest. Legitimate interests relate to being able to conduct and organize business, which includes the marketing of our offerings, protecting our legal interests, securing our IT environment, or meeting client requirements. Examples include:
 - We capture your use of, and interaction with our websites to improve them.
 - We process your account ID or credentials to manage access authorization of our services.
 - Where we have a contractual relationship with the organization that you are working for, we have a legitimate interest to process your personal information used to manage this contract.
 - We process your business contact information in combination with other business relevant information to tailor our interactions with you and promote our products and services.
 - We may process your contact information together with details of a Virtusa event you attended to develop Marketing and business intelligence.
 - To keep our general business operations functional. To this end we may, for example, process the login information of our IT systems and networks, or CCTV footage at Virtusa locations for security and safety purposes.
 - We may also process personal information where it is necessary to defend our rights in judicial, administrative, or arbitral proceedings. This also falls under the legal basis of legitimate interest in countries where they are not a separate legal basis.

- Consent. The processing is based on your consent where we request this. For example, you may provide consent for the optional use of Cookies and Similar Technologies or email of Marketing materials.

- Legal obligation. Where we need to process certain personal information based on our legal obligation. For example, we may be obliged to ask for a government-issued ID for certain transactions, such as for a financing transaction.

Privacy Statement Updates

If a material change is made to this Privacy Statement, the effective date is revised, and a notice is posted on the updated Privacy Statement for 30 days. By continuing to use our websites and

services after a revision takes effect, it is considered that users have read and understand the changes.

California Consumer Privacy Act of 2018 (CCPA) Supplement (“CCPA Supplement”)

If you are a California resident, you have certain rights under the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA), from hereon referred to as CCPA. This supplement is an overview of the information required by the CCPA and provides instructions on how to exercise the rights granted by the CCPA. There may be cases where we present you with an additional privacy notice that includes information specific to an activity or offering.

1. Disclosures about Your Personal Information

Collection, Business Purposes and Disclosure of Personal Information. As described in the Virtusa Privacy Statement to support your relationship with Virtusa or your use of our products and services, we may have collected and disclosed, for a business purpose, information from the following categories in the last twelve months:

- Information necessary to provide you with access to and use of our websites, products and services
- Information necessary to respond to your request for information, order or support
- Information about your use of Virtusa services
- Business contact information of clients, prospects, partners and suppliers
- Information about visitors to our sites and locations
- Information collected for marketing and business

This includes Personal Information defined by the CCPA as:

- Identifiers such as IP address, mobile device ID and cookies
- Personal information under the Customer Records provision of the California Civil
- Code such as your name, postal address, email address or payment information you provide to purchase a Virtusa product or service
- Commercial information related to purchases of Virtusa products or services
- Internet/network activity information relating to your interactions with Virtusa websites or applications
- Geolocation data such as information about the location of your device when you use a Virtusa mobile application
- Audio, electronic, and visual information such as visitors’ presence on security systems at Virtusa offices
- Professional information such as your employer’s name and job title
- Inferences about your consumer preferences
- “Sensitive Personal Information” such as State or Government issued identification (driver’s license) or Financial Information

- When you submit a Data Rights request, you provide us with personal information, including your name and contact details, which we use to respond to your request. In some circumstances, to verify your identity and to ensure we disclose the personal information to the correct individual, we may also request a copy of your photo ID, which is deleted immediately after verification of your identity.
- Upon your Data Rights request, your personal information is processed for handling and fulfilling your request, in line with Virtusa's legal obligations and commitments related to these requests.

Retention: For each category of personal information, Virtusa retains your personal information only for as long as necessary, based retention criteria including:

- the time required to fulfill the business or commercial purposes for which personal information is processed;
- the time required to comply with legal and regulatory retention requirements; and • the time required to maintain contractual and customer relationships.

2. Sources and Sharing of Personal Information

The Privacy Statement describes the types of sources from which we collect Personal Information and how we share your information with third parties. As explained, we may collect Personal Information directly from you, automatically from your device, from selected partners and/or from your employer. We may share information about you with our affiliates, suppliers and, where appropriate, with selected partners to help us provide you, or the company you work for, products or services, or to fulfill your requests, or with your consent.

3. Rights relating to Your Personal Information

In addition to the rights granted under the Virtusa Privacy Statement, as a California resident, you have the right to:

Know your Personal Information

You can request specific pieces of Personal Information, or information about the categories of Personal Information that Virtusa holds about you by submitting a request through productsupport@virtusa.com or by calling (toll free) 1-844-276-0009.

Request Deletion or Rectify your Personal Information

You can request the deletion of or seek to rectify (correct, update or modify) the Personal Information that Virtusa holds about you by submitting a request through productsupport@virtusa.com or by calling (toll free) 1-844-276-0009.

If you are accessing our websites while located outside of California, you can opt-out of the use of email addresses for the purpose of marketing communications by going to "Cookie preferences" in the footer and setting your cookie preferences to "Required".

Limit the Use or Disclosure of Sensitive Personal Information:

Under CCPA, you have the right to limit the use and disclosure of your SPI if we are using your SPI beyond what is reasonable and proportionate to provide the requested goods or services. To limit the use or disclosure of Sensitive Personal Information, then submitting a request through productsupport@virtusa.com.

4. Non-Discrimination

If you choose to exercise any of these rights, we will not deny goods or services to you or provide different quality of services.

5. Authorized Agent

You may use an authorized agent to submit a request about your personal information via productsupport@virtusa.com or by calling (toll free) 1-844-276-0009. To use an authorized agent, you must provide the agent with written authorization. In addition, you may be required to verify your own identity with Virtusa.

6. Additional Disclosure

As permitted under HIPAA, Virtusa may Share, or disclose Deidentified Patient Information (as those terms are defined under CCPA) that has been deidentified pursuant to the deidentification methods described in HIPAA.

How to Contact Us

Questions about this Policy or about Virtusa's handling of your Personal Information may be submitted to productsupport@virtusa.com or by calling (toll free) 1-844-276-0009.