

Adecco



# We Protect Your Privacy



Welcome to Adecco. We look forward to working with you to help you to further develop your career. As you'd expect, to properly perform our services, we collect and use information about you.

Adecco is committed to protecting and respecting your privacy. This Policy describes your privacy rights in relation to the information about you that we process, as well as the steps we take to protect your privacy. We know it's long, but please read this Policy carefully.

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### 1. Some terms to be clear about

First, we need to be clear about how we use some words in this Policy.

It may seem obvious, but in this Policy, you will be referred to as **'the Candidate'** or **'You'**.

When we talk about **'us'** or the **'Company'** or **'Adecco'** we mean the Adecco Group AG's affiliate processing your Personal Information. Adecco Group AG is the holding company of The Adecco Group, with headquarters at Bellerivestrasse 30, 8008 Zurich, Switzerland. Through its various companies and business lines The Adecco Group provides several HR (Human Resources) activities like staffing, secondment, payroll services, recruitment & selection, testing solutions, career transition, talent development, training & education, outplacement and international mobility (**'our Activities'**).

To carry out our Activities the Company uses several IT systems. In some cases, the Company provides a Self-Service Portal (**'Portal'**) for its candidates/personnel. The Portal allows you to search and apply for jobs the Company and its sister companies advertise which match your interests, skills and/or experience, in the locations where you have expressed an interest in working.

Finally, this is a Policy about how we process your information as an individual. It includes facts about you, but also opinions about you and that you hold ("I'm a football fan" for example). It's not about how we process information about companies (although sometimes the two overlap). This type of information is sometimes called 'personal information', 'personally Identifiable Information' or 'PII'.

We use the term **'personal information'** or **'data'** in this Policy.

### 2. What personal information does the Company collect and use?

Personal information that the Company usually collects includes, but is not limited to:

- Your name, date and place of birth, contact details and qualifications (education, training courses and internships), documents evidencing your identity and right to work and any other information you listed on your resume or CV.
- If you log on to the Portal using your LinkedIn or any other social media account: your profile data.
- If you contact us, we will keep a record of that correspondence.
- Feedback about you from our staff and third parties; where you give feedback on others.
- Your feedback about us and our services through our satisfaction surveys.

- We also collect information on your visits to our website/Portal including (but not limited to) your IP address, browser, timestamp, location, country traffic data, location data, weblogs and other communication data and the resources that you access. This information will make your visit to our website/Portal easier in the future. We will, for example, suggest jobs to you which are being handled by branches local to where you were when you contacted us.
- We also collect information for marketing purposes and analysis, including information on how you respond to email, SMS, phone and other marketing campaigns.
- Photos and videos of your attendance at a video interview or training or similar sessions (you will be given a chance at the session to ask not to be videoed or photographed).
- Details of any disabilities and any accommodations we may need to make for you in the workplace.
- In some cases, we will also collect other sensitive data than only details related to disability, when we are permitted to do so by law.
- We would like also to inform you that Adecco will perform whatever assessment are necessary as part of the selection process, which may require the data submitted to be processed, and that it will include the results of the assessment in its recruitment database as part of the selection process.
- You are also informed that, as part of the selection process, the hiring entity may consult details of your public profile on social media (Facebook, Twitter, LinkedIn, etc.), and other public information and records, with the sole purpose of assessing and ascertaining your experience and professional skills, and to know whether your profile is consistent with the Adecco culture and values.

Depending on the relevant circumstances and applicable local laws and requirements, we may collect some of the information listed above to enable us to offer you employment opportunities which are tailored to your circumstances and your interests.

### 3. Why do we use your personal information?

The Company collects and processes personal information for the following purposes ('Purpose'):

- To provide you with our services you expect us to, like finding you suitable jobs/assignments to apply for, helping you with training, or facilitating the process of applying for jobs/assignments. This includes sending your CV to prospective employers for their consideration and keeping you informed of future work opportunities by email, telephone, mail and/ or other communication methods.
- To provide you with our services by assessing and selecting or rejecting your job application including, for example, setting up and conducting interviews.
- To provide you with our services by assessing the results thereto and as is otherwise needed in the recruitment processes including the final recruitment.
- To make any adjustment that you may need in the workplace.
- To send you direct marketing, for example, via e-mail, messaging or telephone.
- To further develop, test and improve our website/Portal, or other existing or new systems/processes to better serve you; this takes place in the context of new IT systems and processes, so that information about you will be used in the testing of those new IT systems and processes where dummy data cannot fully replicate the operation of that new IT system.
- To perform studies and statistical and analytical research. For example, to compare the effectiveness of our placement of candidates between different business sectors and geographies and seek to identify factors that can influence any differences we identify
- To transfer data to third parties in accordance with paragraph 8 below.
- Where necessary, to comply with any legal obligation
- We will also process your information to:
  - a. promote the security and protection of people, premises, systems and assets;
  - b. monitor compliance with internal policies and procedures;
  - c. administer communications and other systems used by Adecco (including internal contact databases);

- d. investigate or respond to incidents and complaints;
- e. to promote internally that training sessions have taken place and utilize their content (in the case of photos or videos of training sessions), to market similar sessions internally and externally to third parties. In this case we will ask you for an explicit consent; and
- f. participate in any potential or actual purchase or sale, or joint venture, of all or part of a business or company, that any member of Adecco wishes to participate in.

#### 4. Why and on which basis do we use personal information?

We are required by law to have a ground set out in the law to process the information we hold about you. The legal grounds can be:

- **Performing a contract or taking steps prior to entering a contract**

When you are already working with or about to engage through Adecco, our processing of personal information for all these purposes is based on processing grounds like the performance of a contract, or about to enter into a contract. These services can be such as providing you with suitable jobs to apply for or helping and assisting you with training and the application process.

- **Compliance with legal obligations**

Sometimes the processing is necessary to comply with legal or regulatory obligations. Public authorities, such as tax, finance or data protection authorities may request personal information from us and provide us with a statutory reason to disclose information about you (e.g., the prevention or detection of a crime). In these circumstances, we are forced by law to provide the authorities with your data.

- **Fulfilment of our legitimate interest**

The processing is necessary in the legitimate interests of Adecco in exercising its and its staff fundamental rights to run a business in a way which does not unduly affect your interests or fundamental rights and freedoms. This means that when processing is necessary for the legitimate interests of Adecco, we balance your interests or fundamental rights and freedoms against our legitimate interest in processing. This ensures that we are not processing data in a manner that your interest and fundamental rights override our interest in such processing.

We shall only process your personal information other than on these grounds with your consent, which is a further processing ground.

#### 5. Do you have to give us the personal information we ask for?

You are not obliged to provide your personal information to us, but it would not be possible for us to work with you, or provide our services to you, if you do not provide us with a required minimum in order to assess your suitability for a position with us. It may also limit the Services that you can receive from us if you in some instances choose to provide us with limited personal information.

#### 6. Do we process information about you without any human intervention at all?

Yes, we do at times. However, we do not use your personal information in any automated decision making (a decision made solely by the creation and application of technologies without any human intervention) or profiling (processing of personal information with a range of technologies that reduce human intervention to evaluate certain conditions about an individual) that produces a legal effect or similarly significant effect concerning you

We use a range of technologies to analyze your data. In all cases, there is always human intervention in these processes, as we use these tools to support our expert human decision makers.

We use automated systems/processes with the conditions described in the previous paragraph to help our staff manage large volumes of data or applications, and we might use AI (for instance machine-learning, logic-or knowledge based and statistical approaches) to provide you, and our clients, with the services you request from us. While we do use AI systems, all decisions which may affect you are taken by our trained recruiters. Accordingly, these AI systems do not have legal effect.

For examples, when our clients are looking for candidates for jobs, we can conduct a search of our lists of candidates using machine-learning, logic- or knowledge based and statistical approaches which uses attributes such as your job title, availability, skillset, assessment scores and locations, to compile a shortlist which displays a list of candidates that are most likely to fulfil the client's requirement.

### 7. How long do you keep my personal information for?

The Company can keep your personal information for up to 7 years after you register with us. If you are successful in finding work through us, the Company will need to keep your personal information for a longer period in order to comply with its on-going legal and contractual obligations. Generally, we retain your personal information concerning taxes, contracts of employment and any financial information (including payroll data and data relating to pay, etc.) for 7 years after your employment ends. However, the retention period can be different depending on the relevant local laws of each country, which shall prevail.

### 8. Do we transfer your personal information to third parties (including overseas transfer)?

As mentioned above, we usually disclose your data to third parties. This is done to complete the Purposes set out above. We do this in the following circumstances:

- **To our suppliers.** We will, for example, engage a supplier to carry out administrative and operational work in support of our relationship with you. The supplier(s) will be subject to contractual and other legal obligations to preserve the confidentiality of your data and to respect your privacy, and will only have access to the data they need to perform their functions; the relevant suppliers are typically IT suppliers (who host or support our IT systems, including information about you), premises management companies (who look after physical security at our buildings, and therefore need to know about you to allow access to our buildings) and back office finance and accounting management providers (who need to handle details of candidates in order to process accounts payable and receivable).

We also engage suppliers who provide IT technology services and solutions, which might include video interview and skills assessment tools.

- **To members of The Adecco Group.** Different members of the group fulfil different functions and as result your information will be shared with them for different reasons:
  - a. information is shared with members of The Adecco Group that provide IT functions for The Adecco Group companies world-wide;
  - b. information is also shared with members of The Adecco Group worldwide (including the legal entities acquired after the collection of information) for the purposes previously described or to propose offers to you adapted to your profile where you have expressed an interest in local or international opportunities in that market, or members of The Adecco Group identify that you may have particular skills required or helpful in that market.

A list of the countries in which we operate is available in the 'choose your country' function of our website at [www.adecco.com](http://www.adecco.com)

- **To our clients/prospective employers.** We will share your data with clients of ours who are offering jobs/assignments you may be interested in, or who are interested in your profile. They owe contractual and other confidentiality obligations in relation to your data to us, and to you.
- **To government or law enforcement authorities.** We will share your data with government, police, regulators or law enforcement agencies if, at our sole discretion, we consider that we are legally obliged or authorized to do so or it would be prudent to do so.
- **To prospective sellers or buyers and their advisors.** As part of due diligence relating to (or implementation of) a merger, acquisition or other business transaction, we may need to disclose your data to the prospective seller or buyer and their advisors.

### 9. What are your rights regarding your personal information?

Under applicable data protection laws, you have the following rights:

- **Right to access and obtain a copy of your personal information**

You are entitled to request confirmation whether we process any of your personal information. Where this is the case, you have the right to access to some of your personal information and to certain information about how it is processed. In some cases, you can ask us to provide you with an electronic copy of your information. In some limited circumstances, you also have the right to request portability of your personal information, which means, we will provide them to a third party upon your request.

- **Right to correct your personal information**

If you can demonstrate that personal information that we hold about you is not correct, you can request that this information is updated or otherwise corrected.

- **Right to be forgotten or to delete personal information**

In certain circumstances you have the right to request that your personal information is deleted. You can make such a request at any time and Adecco will evaluate if your request should be granted, however this right is subject to any legal rights or obligations where we need to retain data. For situations where in accordance with the law, we determine that your request to have your personal information deleted must be granted, Adecco will do so without undue delay. Please bear in mind, once your data is deleted, the Company might not be of service to you anymore. If you want to re-register with the company again, you will need to re-enter your data.

- **Right to restrict or object to the processing of your personal information**

In certain circumstances, you have the right to obtain restriction of the processing of your personal information, or to object to certain processing thereof on grounds relating to your particular situation.

- **Right to withdraw consent**

You have the right to withdraw consent at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you want to exercise any of your rights, please log into the self-service Portal or email us at '[sg.legal@adecco.com](mailto:sg.legal@adecco.com)'.

When you email us to exercise your rights, the Company will need you to identify yourself before actioning your request.

Finally, you have the right to lodge a complaint with the data protection authority in the place where you live or work, or in the place where you think an issue in relation to your data has arisen.

## 10. What about data security when using Adecco Systems?

You are responsible for keeping your login details to the Portal safe, in particular the password that we have given you or that you have chosen. These login credentials are for your own use. You are not permitted to share your credentials or other account details with any other person(s).

## 11. How could you contact us?

If you have any questions or concerns regarding our Policy, would like further information about how we protect your information and/or when you want to contact the Company's Data Protection Officer (DPO), please email us at [sg.legal@adecco.com](mailto:sg.legal@adecco.com)

## 12. How do we handle changes to this Policy?

The terms of this Policy may change from time to time. We shall publish any material changes to this Policy through appropriate notices either on this website or contacting you using other communication channels.