

# 1. introduction and scope.

This privacy policy applies to all information collected by Randstad North America, Inc. ("Randstad,' 'we," "us," "our") and its subsidiaries. Our lines of business include Randstad Accounting & Finance, Randstad General Staffing, Randstad Inhouse Services, Randstad Technologies, Randstad Engineering, Randstad Healthcare, Tatum, and other Randstad brands. The privacy policy describes the personal information we collect, how we use it, and your rights regarding this information.

With this data protection notice, along with our cookie policy, we are providing information about why we collect and use your personal information, how your information is shared, retained and protected, and how you can exercise your personal choices. We will also explain how you can find out what personal information we hold about you.

This data protection notice applies to the processing of personal information we collect when you visit our websites or apps, use our services, visit our branch locations, or when you provide it to us in any other way. We also collect information from third party sources. Additional detail about our practices is provided below based on whether you are a website visitor, candidate, temporary worker or employees, prospective client or client.

## 2. about us

We provide staffing services to clients and job services to candidates seeking current or future job opportunities. We collect personal information to help connect candidates with jobs at Randstad and Randstad clients. We will process your personal information in accordance with this data protection notice (such personal information sometimes also referred to as "data"). For greater clarity, processing means any operation or set of operations which is performed on your personal information, such as collection, storage, adaptation, disclosure, restriction, deletion or destruction, among others (collectively referred to as "processing" or "process").

Except as otherwise set out below, we are the Controller of personal information ("Controller" within the meaning of applicable data protection legislation). For greater clarity, a Controller decides why and how personal information is processed and is responsible for ensuring that all data is processed in accordance with applicable data protection legislation. As the Controller, we will, alone or jointly with others, determine the purposes and means of processing your personal data.



For the efficient operation and management of our business, we may jointly define the purposes and means of processing personal information with Randstad Group Companies (in which case the Randstad Group Companies may be defined as "joint controllers"). Examples of joint processing activities include, but are not limited to, those related to managing our Misconduct Reporting Procedure and Economic Sanctions checks. Please contact us (see the section "Contact us" below) if you want to know more and/or exercise your data protection rights regarding any jointly-controlled processing of your personal data.

### 3. website visitor

When you visit our website, Randstad app, or any Randstad digital platform, we collect some information related to your device, your browser and to the way you navigate our content. We may use cookies to collect this personal information.

Cookies are small text files that are saved on your device when you visit our website. Cookies enable the website to remember your actions and preferences (for example, your choice of language) and recognize you when you return, so that we may analyze trends, determine your areas of interest, and administer our website to speed up the navigation process and to make your site experience more efficient.

Please find more information on the cookies we use, for what purpose and further settings for configuring or deleting cookies in our cookie policy.

### what personal information do we collect

When you visit our website, we gather information that relates to your device, your browser and to the way you navigate our website content, such as:

- the Internet Protocol (IP) address of your device
- the IP address of your Internet Service Provider
- device screen resolution
- device type (unique device identifiers)
- browser and operating system versions
- geographic location (country only)
- preferred language used to display
- the date and time of access to the website
- the internet address from which you were directly linked through to our website
- the control system that you use
- the parts of the website that you visit
- the pages of the website that you have visited and the information that you viewed
- the hyperlinks you have clicked



the material that you send to or download from our website

If you choose to download our reports or white papers; or to subscribe to our newsletter news, events, and alerts; or submit an inquiry we may ask you to fill out a form with information such as your name, e-mail address, job title, and company. Once you do so, we will be able to relate the information listed above directly to you.

### why do we need your personal information

Randstad processes your personal information only for the purposes specified below:

- To manage the website and for system administration purposes (e.g., diagnosing technical problems, analyzing the traffic to our website)
- For web analytics, in order to improve the user experience (analyzing the way our pages are visited, analyzing trends, observe and measure how our visitors engage with our website) and the quality of the content provided to you (e.g., job posting)
- If you choose to download our reports or white papers or to subscribe to news, events and alerts, fill in webforms, we will use the information you provide us to send you the content requested, to communicate with you (including, where you agree, to send you marketing communications) and to improve our marketing and communication strategy
- For responding to specific inquiries
- Cooperating with law enforcement agencies/courts, management of legal disputes/claims, and handling any reports through Randstad's misconduct reporting procedure

## 4. candidates

We use your personal information when providing our HR services, which include services in the field of recruitment and selection, temporary staff, secondment, payroll, personal development, career guidance, coaching, planning, and personnel and salary administration as further described in the Terms and Conditions (collectively "Services").

#### what personal information do we collect

If you are a candidate, we collect and process personal information about you such as:

• Identification information – we may process your name, contact information (including home address, email address, home phone number and mobile phone number), citizenship and country of residence, date of birth.



- Demographic information, including age, ethnicity, and gender. Providing this
  information is voluntary and is only used by Randstad to meet diversity goals.
   We do not provide this information to hiring managers.
- CV/resumes and other recruitment information we may process your
   CV/resume, work history, information about your skills, your experience and educational background and other relevant information (such as your photograph, interview notes and personal data included in the cover letter or as part of the application process).
- Information you choose to import from third party services like file storage sites or single sign-on services.
- When using a mobile application, your precise geographic location.
- Compensation and benefits information we may process personal data relating to your current compensation and benefits including (without limitation) your current bonus, recurring payments and benefits.
- Government issued identifiers we may process government issued identifiers including (without limitation) social security number, passport or drivers license, as legally required.
- Photographs and video footage when participating in recruitment-related events, meetings, conferences, visiting a branch, etc., we may process photographs or videos of you.
- Visitor information when accessing our buildings, we may collect your name, contact details, license plate number, and other identification for security reasons. Where we are legally required to do so we may also ask you to disclose information about your health (including information related to viral infections, flu, etc.) for health and safety reasons.
- Information you choose to share with us we may process additional personal data if you choose to share that with us.

In addition to information we collect directly from you, we also may collect information about you from third party sources. These sources include:

- third party websites and services like job boards and professional network sites;
- background check providers;
- your references;
- business intelligence sources, including data aggregators and list providers;
- Randstad clients;
- Randstad affiliates, which are companies that own Randstad, that are owned by Randstad, or are under common ownership with Randstad.



### why do we need your personal information

Randstad processes your personal information only for the purposes specified below:

- To provide our Services to you (including matching and proposing you to clients, interviews, assessments). For example, we may contact you to recommend jobs to you based on your profile and enable our consultants to provide you with tailored job opportunities, career advice, reskilling options, suggest additional training where necessary, and introduce you to hiring managers.
- Training and updating of systems/statistical purposes. Some of the systems that
  we use to provide our services are based on machine learning technology. In
  order for that technology to function reliably, it needs to be trained and updated
  on the basis of existing data. We may also process personal data in an
  aggregated manner for reporting or statistical purposes. We may share this
  aggregate personal data with clients, advertisers, and other third parties. This
  information does not identify you personally.
- Dispute management, litigation and handling any reports through Randstad's misconduct reporting procedure
- Compliance with labor/employment, tax and social security laws and other legal or regulatory requirements (e.g. equal opportunity and workplace diversity requirements)
- Events
- Facilities, security, and contingency planning purposes
- To conduct corporate transactions (including mergers, acquisitions and divestments)

## how long we keep your personal information

Randstad maintains record retention schedules to ensure that personal information is retained only as long as reasonably necessary for the fulfillment of the purposes for which such data was collected or otherwise meet valid legal or business requirements.

# 5. temporary workers and employees

We use personal information in order to facilitate temporary assignments with our clients. We use your personal information when providing our HR services, which include services in the field of recruitment and selection, temporary staff, secondment, payroll, personal development, career guidance, coaching, planning, and personnel and salary administration as further described in the Terms and Conditions (collectively "Services").

## what personal data do we collect

When you are a temporary worker on an assignment at one of our clients, we may Process personal information about you such as:



- Identification information your name, contact information (including home address, email address, home phone number and mobile phone number), citizenship and country of residence, date of birth, (in exceptional cases) gender, digital signature and languages spoken.
- Professional information we may process personal information related to your work including (without limitation) your job title, description and location, your department, professional email address, reporting levels, and employment status (full-time/part-time/etc.).
- Financial information financial information including (without limitation) your bank account number, and bank details.
- Salary information we may process salary information including (without limitation) recurring payments and benefits, any bonus or other compensation.
- Performance-related information performance-related information including (without limitation) information on your performance reviews.
- Disciplinary information information relating to disciplinary measures taken against you, if any.
- Grievance information In order to assist in the reporting of grievances and
   (suspected) misconduct within the Randstad Group of companies, we have
   established dedicated channels through which stakeholders may voice concerns,
   either through local reporting mechanisms in place at the level of the local
   Randstad Group companies or, for serious misconduct (including
   whistleblowing), through our Integrity Line, the Randstad Group reporting
   facility. Whenever we receive a grievance report or a report about (suspected)
   misconduct we may process personal data related to the complainant, the other
   individuals mentioned in the complaint and the person(s) that is/are subject of
   the complaint and/or of the investigation into the complaint.
- Government issued identifiers government issued identifiers including (without limitation) social security number, passport or driver's license number, as legally required.
- CV/resumes and other recruitment information your CV/resume and other relevant information (such as your photograph, interview notes and information included in the cover letter or as part of the application process).
- Travel and expense data travel and accommodation information and expenses including (without limitation) travel itineraries, hotel and travel reward cards.
- Information you choose to share with us information you choose to share with us, including (without limitation) information you share when using IT support or calling the helpline, and information about you that may be conveyed by your use of a webcam in communicating with us.
- Vehicle information information about your personal or company car including (without limitation) your license plate, parking tickets and driving fines.



- Photographs and video footage when participating in external or internal events, meetings, conferences or other events, we may process photographs or videos of you.
- Trade union membership information revealing your trade union membership.
- Family and dependent information information related to your family and dependents including (without limitation) details regarding family composition (names, genders, ages), any accommodation or education requirements for children or dependents, health information, and emergency contact information.
- Information related to identification/access control cards employee identification and access control cards may contain your name, photograph, employee number and may be linked to other details on record (department, phone number, license plate).
- CCTV footage we may process footage of you obtained through our use of CCTV surveillance systems.
- Survey results we may process your responses to questions in employee surveys.
- Information related to your usage of Randstad devices, software and access to Randstad's network – we may process information related to your use of our devices, software and access to our networks, including (without limitation) your browsing history, your use of email, internet and social media, whether at the workplace, on our equipment or otherwise through our networks.
- Visitor information when accessing our buildings, we may collect your name, contact details, car plate number, identification, etc. for security reasons. Where we are legally required to do so we may also ask you to disclose information about your health (including information related to viral infections, flu, etc.) for health and safety reasons.
- Special categories of data, such as:
  - Health-related information health-related information including (without limitation) injuries and exposure, incident reports, disability, sickness and absences and maternity leave information, as legally required.
  - Ethnic origin information revealing your racial or ethnic origin, as legally required or should you choose to.
  - o Biometric-biometric data for timekeeping.

To the extent we process these special categories of data, we will protect, secure and use that information in a manner consistent with this notice and applicable laws.

Trade sanctions information relating to you - we may verify whether you are a
politically exposed person, a specially designated national or otherwise subject
to sanctions under applicable laws or regulations.



### why do we need your personal information

Randstad Processes your personal information only for the purposes specified below:

- General HR management and administration purposes (including workforce management)
- Compensation, payroll and expense reimbursement (including reporting and billing to clients)
- Insurance, pension and other benefits
- Performance management, career development and training
- Fleet management
- Disciplinary and grievance management, investigations, appeals (including managing complaints) and handling reports through Randstad's misconduct reporting procedure
- Dispute management and litigation
- Health and safety management
- Managing holidays, leaves and other absences
- Compliance with employment/labor, tax and social security laws and other legal or regulatory requirements (e.g. equal opportunity and workplace diversity requirements)
- IT support
- Facilities, security and contingency planning purposes
- Network and device usage optimization and related security controls (including company network access and authentication)
- Preventing, detecting and investigating fraud and other crimes, and compliance with sanctions regimes (including identification of politically exposed persons, specially designated nationals and screening against sanctions lists)
- Emergency and disaster management
- Relocation, mobility and travel management
- To monitor and enforce compliance with Randstad policies and procedures
- To monitor and enforce compliance with legal obligations applicable to us (including the requirements set out in your contract with us)
- Recruitment and staffing
- Employee surveys, statistical purposes
- Events
- To manage memberships of employees to professional associations
- To perform internal and external audits
- To conduct corporate transactions (including mergers, acquisitions and divestments)

how long we keep your personal information



Randstad maintains record retention schedules to ensure that personal information is retained only as long as reasonably necessary for the fulfillment of the purposes for which such data was collected or otherwise meet valid legal or business requirements.

## 6. business relations

We process your personal information if you are working for companies with which we are conducting (or intending to conduct) business (e.g., to negotiate agreements and to maintain a business relationship with the company you work for).

### what personal information do we collect

We process the following personal information about you:

- Identification information we may process your name and other contact information (including email address, landline phone number and mobile phone number), digital signature and languages spoken.
- Professional information we may process information related to your work including (without limitation) your job title, your location and your department.
- Photographs and video footage when participating in our events, meetings, conferences etc., we may process photographs or videos of you.
- Survey results we may process your responses to questions in surveys.
- Visitor information when accessing our buildings, we may collect your name, contact details, car plate number, identification, etc. for security reasons. Where we are legally permitted to do so we may also ask you to disclose information about your health (including information related to viral infections, flu, etc.) for health and safety reasons.
- Information you choose to share with us we may process additional information if you choose to share that with us.
- Trade sanctions information relating to you we may verify whether you are a
  politically exposed person, a specially designated national or otherwise subject
  to sanctions under applicable laws or regulations.

## why do we need your personal information

Randstad processes your personal information only for the purposes specified below:

- To administer and manage the contractual relationship between Randstad and our clients and service providers
- Business development (including sending direct marketing and offers)
- Facilities, security and contingency planning purposes
- Health and safety management
- To conduct corporate transactions (including mergers, acquisitions and divestments)



- Events
- Preventing, detecting and investigating fraud
- IT support
- Surveys (including satisfaction surveys)
- Dispute management, litigation and handling any reports through Randstad's misconduct reporting procedure
- Compliance with legal or regulatory requirements
- Preventing, detecting and investigating fraud
- To monitor and enforce compliance with Randstad policies and procedures
- To perform internal and external audits

### how long we keep your personal information

We maintain record retention schedules to ensure that personal information is retained only as long as reasonably necessary for the fulfillment of the purposes for which such data was collected or otherwise meet valid legal or business requirements.

# 7. HR technologies

## talent matching and services for candidates

We use innovative HR technologies that help us digitize and enhance a variety of recruitment-related processes. Some of these technologies use artificial intelligence (AI) or machine learning techniques.

For example, we use chatbots to improve your candidate experience. Chatbots give you the opportunity to answer questions based on the requirements of the job you apply for. This is a user-friendly way to:

- provide us with relevant information that may not be readily apparent from your application, profile or resume.
- know promptly whether your skills meet a job's essential requirements and, if not, to easily explore other jobs or to identify gaps in their skillset.
- answer at any moment convenient to the user.

As part of the larger recruitment process, HR technologies allow us to connect candidates more quickly to our consultants. This, in turn, allows our consultants to better support candidates in exploring jobs and to deliver the right candidates more quickly to our clients. HR technologies also allow our consultants to find people based not only on the jobs they qualify for but also on the basis of jobs they are interested in.



### improving the client experience

HR technologies help us to search through a broader and more diverse set of candidates so that we become even better at finding the best talent with the most relevant skill-set for our clients.

#### web beacons

Our emails may contain a single, campaign-unique "web beacon pixel" to tell us whether our emails are opened and verify any clicks through to links or advertisements within the email. We may use this information for purposes including determining which of our emails are more interesting to users, to query whether users who do not open our emails, wish to continue receiving them and to inform our advertisers in aggregate how many users have clicked on their advertisements. The pixel will be deleted when you delete the email. If you do not wish the pixel to be downloaded to your device, you should select to receive emails from us in plain text rather than HTML.

### responsible use of HR technologies

Randstad is committed to the ethical and responsible use of innovative HR technologies (you can read our AI principles here).

We strive to involve human beings whenever we make decisions that significantly impact you. If, in exceptional cases, we were to make such decisions based on a fully automated process (ie. without involvement of humans), we will only do so where that is permitted by law and after having notified you.

To ensure all candidates are treated fairly we take steps to avoid bias where we use HR technologies. For example:

- We regularly test the output created by these technologies to identify potential bias.
- We regularly obtain expert advice to continuously improve the way in which we identify and remove bias.
- Both our consultants and our search and match algorithms are thoroughly trained and always work together.

# 8. with whom do we share your personal information

We may share your personal information:

with other entities of the Randstad group of companies for the purposes of
efficient management of business, compliance with legal and regulatory
requirements and to provide our services to you and to our clients. For an
overview of these entities, click <a href="here">here</a>.



- with Randstad clients for the purpose of recruitment and provision of temporary work.
- with third parties providing HR-related services we use (e.g,. payroll service providers).
- with third-party providers of IT-related services (e.g., IT-infrastructure, software, and databases).
- with third parties providers of marketing-related services (e.g., software, databases, list providers and aggregators, event organization).
- with providers of professional services (e.g., to our auditors, our tax advisors, our legal advisors).
- with banks and insurers (e.g., in order to pay the salaries of our temporary workers we share some of their personal data with our bank).
- with pension funds.
- with public authorities (e.g., pursuant to applicable law Randstad must disclose personal data to the social security authorities and to tax authorities).
- with law enforcement authorities, courts and regulatory authorities (e.g., as part of a criminal investigation).

We may also disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets; or
- if all or a substantial part of our assets are acquired by a third party, in which
  case the personal information that we hold about you may be one of the
  transferred assets.

When we share your personal information as described above, such personal information may be transferred outside of the United States. In that event, we will only do so in line with applicable law, and we will require that there is an adequate level of protection for your personal data, and that appropriate security measures are in place.

# 9. how we will protect your personal information

We have technical and organizational security measures in place to protect your personal information from being accidentally lost, used, altered, destructed, disclosed or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your personal information are governed by Randstad's rules for information and IT security, data protection and other internal policies and guidelines.



While we have measures in place to protect your personal information, it is important for you to understand that 100% security cannot be guaranteed. Accordingly, we have procedures in place to deal with data security incidents and to comply with legal requirements applicable to the detection, handling and notification of personal information breaches.

# 10. your personal information protection rights

You have the following rights regarding your personal information:

You have the right to know whether Randstad has collected personal information from you. You may request that Randstad tell you:

- the categories or specific pieces of personal information that Randstad has collected about you;
- the categories of sources where Randstad obtained personal information about you;
- the business purposes for which Randstad collects your personal information;
   and
- the categories of third parties with which Randstad shares personal information

You can make 2 such access requests every 12 months.

You have the right to request that Randstad delete or correct any of your personal information that Randstad has collected from you, with certain exceptions. We may refuse your request if we are required by law to keep the information, or if the law otherwise permits us to keep information. If we deny a request, we will tell you why the request was denied.

To exercise your right to access or delete or correct personal data, complete the form available at this link: https://privacy-request.randstadusa.com.

Before we grant you access to or deletion of your personal information, we must verify your identity. To do this, we will ask you to confirm information we have previously collected about you. If we ask you to verify your identity, and you do not promptly cooperate, we may be unable to fulfill your request. We will make commercially reasonable efforts to fulfill your request within 45 days, however if we need additional time we may notify you during the initial 45-day period that we will extend the time frame up to an additional 45 days.



# 11. children's privacy

Randstad's services are only available to individuals over the age of 18. Randstad is not intended for and does not knowingly collect personal information from individuals under 18. If we believe you are under 18, we may delete your information at any time without notice to you. If you are the parent or guardian of a child under the age of 13 and believe that your child has provided personal information to us, you may use the "contact us" information below to exercise your rights as a parent or guardian.

# 12. changes to this data protection notice

We may update this notice from time to time. You can see the date on which the last change was made below in this notice. If we make any material changes, we will notify you by email (using the email address specified in your account) where required, or by a notice on this website. We advise you to review this notice regularly so that you are aware of any changes. By engaging with us after this privacy policy has been updated, you agree to the updated terms.

### 13. contact us

If you have any questions about this policy or any privacy concerns, or would like to exercise your rights, please contact us at <a href="https://privacy-request.randstadusa.com/">https://privacy-request.randstadusa.com/</a> or

Privacy Office Randstad North America, Inc. One Overton Park 3625 Cumberland Blvd SE Atlanta, GA 30339