

Allegis Group

Employee Personal Data Fair Processing Notice

1. About this Notice

- 1.1 This Employee Personal Data Fair Processing Notice (“**Notice**”) relates to the processing of personal information of current and past employees (“**Employee(s)**”) of Allegis Group, Inc., and its subsidiaries (“**Allegis Group**”, “**we**” and “**our**”).
- 1.2 During the course of your employment with Allegis Group, we may need to collect personal information about you. We may also need to collect certain types of personal information that are regarded as more "sensitive". See Section 2 below for further information.
- 1.3 This Notice sets out the types of personal information that we collect and process about Employees and their dependents (“**Employee Data**”), the purposes for which we process Employee Data and the rights that you have in relation to the Employee Data that we process about you. It also outlines the standards by which we will process Employee Data.
- 1.4 Allegis Group treats compliance with its data protection obligations seriously. This is why we have developed our Employee Privacy Policy, which includes our Global Privacy Principles (which describe the standards that Allegis Group applies to protect personal information), and this Policy requires Employees to ensure that the personal information they collect and use is handled in accordance with applicable data protection laws.
- 1.5 In relation to any Employee located in the European Economic Area (“**EEA**”) or Switzerland, the Allegis Group entity which employs the Employee acts as the data controller for any Employee Data relating to that Employee. As a data controller, that Allegis Group company is responsible for ensuring that the processing of Employee Data complies with applicable EU or Swiss data protection law.
- 1.6 Please take the time to read this Notice carefully. If you have any questions or comments, please contact privacyofficer@allegisgroup.com or privacyofficerEU@allegisgroup.co.uk.
- 1.7 All of the Allegis Group policies referenced in this Notice and this Notice are provided to you at the time you are hired, can be found on your company’s intranet policy page and are available upon request by contacting privacyofficer@allegisgroup.com or privacyofficerEU@allegisgroup.co.uk.

2. Employee Data and Sensitive Employee Data – What We Collect

- 2.1 We process Employee Data as necessary to perform Allegis Group's business functions and our role as an employer, including administrative and managerial tasks in connection with employment and the provision of services to Employees.
- 2.2 For example, we may collect the following Employee Data about you (including any updates you provide to us regarding the information below):
 - Name and other personal information such as gender, date and place of birth, and marital status.
 - Contact information, such as postal address, telephone number, e-mail address and emergency contact names and their contact information.
 - Photographs (e.g., internet or intranet bio photos and photos at office events)

- Professional information such as employment application and/or resume/CV, past employment history, including prior employers, prior compensation and references, educational background, areas of expertise, academic and training related information, such as academic degrees, professional qualifications, certifications or trainings and security clearance information, and languages and other skills, in order to evaluate potential employees for employment. This information will continue to be stored as part of your personnel file during employment.
- Social security or other national insurance or other government issued identification information, including driver's license information.
- Information and documentation required under immigration laws such as passports, work permits, citizenship and residency information.
- Family data and health-related information in order to provide applicable benefits. For instance, we may collect personal information about your family and dependents for emergency contact details or to provide health or insurance benefits to you and/or them.
- Pay and financial information for payroll, taxes, expense reimbursement and related purposes, including base salary, bonus, benefits, incentive compensation, bank information and credit card information.
- Information necessary to evaluate the performance of Employees, including salary reviews, disciplinary records, talent reviews and performance appraisals.
- Management records such as working time records, vacation/holiday and other paid time off or absence records.
- System access information such as system ID, e-mail account, system passwords and electronic content produced as a result of your use of Allegis systems.

2.3 Within Employee Data, we may also collect certain types of personal information that is treated as sensitive personal information, if permitted or required by local law. Sensitive personal information includes, for example, information relating to a person's race or ethnic origin, political opinions or religious beliefs, physical or mental health or condition of you, your family members or your dependents, sexual orientation, trade union membership, genetic data, commission or alleged commission of criminal offences and any related legal actions or the processing of biometric data for the purposes of uniquely identifying an individual ("**Sensitive Employee Data**").

2.4 Although we aim to minimize the amount of Sensitive Employee Data that we process, we may process such Sensitive Employee Data in certain circumstances, such as when we are required to do so by law (e.g. equal opportunity monitoring or internal policies related to diversity and anti-discrimination) or it is necessary to provide you with a service (such as a health or other benefit) or if we need to perform a criminal background check, drug/alcohol test or fitness for duty testing.

2.5 To the extent the information you provide contains Sensitive Employee Data, you expressly authorize us to handle such information as specified in this Notice.

3. The Purposes for Which We Process Employee Data

3.1 We will generally process Employee Data:

- For work activities and human resources purposes, such as: recruitment; administering benefits (including medical, pension, retirement and other benefits, and eligibility of dependents); administering salary and expenses, payment administration, reviews, wages, and other awards such as bonuses, commissions and incentive plans; carrying out performance appraisals, career planning, training, promotions, transfers,

secondments and skills monitoring; managing sickness or other types of leave; honoring other contractual benefits; providing employee references and loans; performing workforce management, analysis and planning; performing employee surveys; performing background checks, employment reference checks, and education verifications; managing disciplinary matters, grievances and terminations; reviewing employment decisions; making business travel arrangements; managing business expenses and reimbursements; planning and monitoring training requirements and career development activities and skills; and creating and maintaining internal employee directories and internal alerts regarding birthdays and service anniversaries.

- To place you with a client as part of our staffing business.
- If you make use of any Allegis Group extranet sites (for example the Communities site), in connection with and to enable your access and use of such sites; to manage the IT and communications systems generally; manage service development; and improve services.
- To manage company assets; allocate company assets and human resources, for strategic planning, project management, business continuity, compilation of audit trails and other reporting tools; to maintain records relating to business activities, budgeting, financial management and reporting, and communications; and to manage mergers acquisitions sales, re-organizations or disposals and integration with purchaser(s).
- To process Employee Data when required or allowed to do so by law (such as income tax, legally required deductions, and record-keeping and reporting obligations); conduct internal audits; comply with government inspections, audits and other requests from government or other public authorities (including to meet national security or law enforcement requirements); respond to legal process such as subpoenas or garnishments; or as necessary to enable Allegis Group to protect its interests, pursue legal rights or remedies (for instance, when necessary to prevent or detect fraud or crime), defend litigation and manage internal complaints or claims; conduct internal investigations and comply with internal policies.
- To facilitate communication with you; ensure business continuity; provide references; protect the health and safety of employees and others; safeguard IT infrastructure, office equipment and other property; and communicate with you or your designated contacts in an emergency.

4. How We Protect Your Privacy

4.1 We will process Employee Data in accordance with this Notice.

4.2 **Honesty, openness and fairness:** We will process Employee Data fairly, openly and honestly. This means that we are transparent about how we process Employee Data and that we will process it in accordance with applicable law.

4.3 **Purpose limitation:** We will process Employee Data for specified and lawful purposes, and will not process it in a manner that is incompatible with those purposes.

4.4 **Proportionality:** We will process Employee Data in a way that is proportionate to the purposes which the processing is intended to achieve.

4.5 **Data Accuracy:** We take appropriate measures to ensure that the Employee Data that we hold is accurate, complete and, where necessary, kept up to date. However, it is also your responsibility to ensure that your Employee Data is kept as accurate, complete and current as possible by informing Allegis Group of any changes or errors. You should notify your local Human Resources Representative of any changes to the Employee Data that we hold about you and your family (e.g. a change of address).

4.6 **Data Security:** We implement appropriate physical, technical and organizational security measures to protect Employee Data against unauthorized or unlawful processing or disclosure. For further information on the steps

that we take to keep Employee Data secure and your responsibilities in this regard, please refer to the Allegis Group Information Security Policy and other related policies within the Allegis Group Information Security Management Framework, which were provided to you at the time of hire, can be found on the company's intranet policy page or can be requested by contacting privacyofficer@allegisgroup.com or privacyofficerEU@allegisgroup.co.uk.

- 4.7 **Data Processors:** We may engage third parties to process Employee Data for and on behalf of Allegis Group. We require such data processors to process Employee Data on our instructions and to take steps to ensure that Employee Data remain protected.
- 4.8 **Data Retention:** We will not keep Employee Data for longer than is necessary for the purposes for which we process them or as required by law, contract or Allegis Group policies, such as the Allegis Group Record Retention Policy, which was provided to you at the time of hire, can be found on the company's intranet policy page or can be requested by contacting privacyofficer@allegisgroup.com or privacyofficerEU@allegisgroup.co.uk.
- 4.9 **Accessing Your Data:** You have a right to request access, under applicable law, to the Employee Data that Allegis Group holds about you. If you make a request to access your Employee Data we may charge you a fee subject to a maximum specified by applicable law. Where such rights are available to you under applicable law (for example, if you are resident in the EEA or Switzerland), you may also ask us to correct any inaccurate Employee Data we hold or to delete such data. If you wish to exercise this right, and you are a not a resident of the EEA or Switzerland, please contact privacyofficer@allegisgroup.com and if you are an EEA or Swiss resident, please contact privacyofficerEU@allegisgroup.co.uk.

5. International Data Transfers

- 5.1 Employee Data may be collected, used, processed, stored or disclosed by Allegis Group and our service providers outside of your country of residence for purposes consistent with this Notice. For example, since Allegis Group has affiliated entities operating in the United States and other countries around the world, Employee Data may be transferred within Allegis Group on a worldwide basis, including Allegis Group recipients in countries outside of your country of residence. If you are located within the European Economic Area ("EEA") or Switzerland, these countries (including the United States) may not necessarily have data protection laws as comprehensive or protective as those in your country of residence.
- 5.2 Employee Data is only transferred by us to another country if this is required or permitted under applicable data protection law and provided there is adequate protection in place for the Employee Data. We will ensure the Employee Data is treated in accordance with this Notice and the Allegis Group global data transfer agreement wherever and whenever we process it. The Allegis Group global data transfer agreement incorporates the standard data export terms approved by the European Commission (the so-called "**model clauses**") to ensure that Allegis Group continues to protect Employee Data it processes and exports outside the EEA and/or Switzerland globally to EU and Swiss data protection standards.
- 5.3 **Compliance with EU-US and Swiss-US Privacy Shield**
- For Employee Data we receive from the EEA and from Switzerland, Allegis Group, Inc. and its U.S. subsidiaries ("Allegis US") have committed to handling such information in accordance with the EU-US Privacy Shield Framework Principles and the Swiss-US Privacy Shield Framework Principles as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from countries in the EEA and Switzerland. All Allegis US companies have certified that they adhere to the Principles of Notice, Choice, Accountability for Onward Transfers, Security, Data Integrity & Purpose Limitation, Access and Recourse, Enforcement & Liability (the "Principles").

- If there is any conflict between the policies in this Notice and the Principles, the Principles shall govern. To learn more about the Principles and to view our certification, please visit: <https://www.privacyshield.gov/>
- Allegis Group entities located in the United States are subject to the investigatory and enforcement powers of the Federal Trade Commission.
- If you are resident in the EEA or Switzerland and believe that your personal information has not been processed in compliance with the Principles, you may raise their complaints in a number of ways:

(1) You can contact us directly using the contact details provided below and we will respond to your complaint within 45 days of receipt:

[Allegis Group Limited](#)
[c/o Legal Department](#)
[OTV House East Wing](#)
[Wokingham Road](#)
[Bracknell](#)
[Berkshire](#)
[RG42 1NG](#)
[ATTN: Legal Team](#)
privacyofficerEU@allegisgroup.co.uk

(2) For residents in the EEA, if you have an unresolved privacy or data use concern that we have not addressed satisfactorily, you can contact your state or national data protection or labor authority in the jurisdiction where you work. We have committed to cooperate with the panel of the EU Data Protection Authorities (DPAs), the state or national data protection authority where you work, to investigate unresolved complaints.

(3) For residents in Switzerland, if you have an unresolved privacy or data use concern that we have not addressed satisfactorily, you may contact the Swiss Federal Data Protection and Information Commissioner who may refer your complaint to the US Department of Commerce or the Federal Trade Commission for further investigation as we have committed to cooperate with the Swiss Federal Data Protection and Information Commissioner and to comply with the advice of the Commissioner.

6. Monitoring

- 6.1 Allegis Group retains the right to monitor all IT systems, physical areas of the business and/or work related activities to protect Allegis Group, its Employees and third parties and to ensure the appropriate use of the Allegis Group resources and information assets in compliance with privacy law and in accordance with the Allegis Group Acceptable Use Policy.
- 6.2 The exact purposes for which monitoring may be conducted and the parameters of such monitoring may depend from country to country to ensure such activities comply with applicable law. For more information on the monitoring activities of the Allegis Group, please read the Acceptable Use Policy, which was provided to you at the time of hire, can be found on the company's intranet policy page or can be requested by contacting privacyofficer@allegisgroup.com or privacyofficerEU@allegisgroup.co.uk.

7. Disclosures of Employee Data

- 7.1 We will not share, sell or otherwise disclose Employee Data for purposes other than those outlined in this Notice without the consent of Employees.
- 7.2 Examples of instances when we might share Employee Data without the consent of the Employee include:

- ***Compliance with laws*** – disclosures that Allegis Group considers necessary or required by law, in order to comply with legal process or government requests (including in response to public authorities to meet national security or law enforcement requirements) and/or to protect the safety of Employees, customers, business partners or third parties;
- ***Vendors and other service providers*** – disclosures to third party vendors and other service providers we use in connection with the services they provide to us, IT platform management or support services, infrastructure and application services, data analytics, drug and background screening, payroll processing services, and retirement, health and welfare and other similar benefits;
- ***Consultants*** - disclosures to auditors, advisors, legal representatives and similar agents in connection with the advisory services they provide to us for legitimate business purposes;
- ***Business Transfers*** – disclosures to a party to which Allegis Group is contemplating selling a business unit (in which case Employee Data may be included among the transferred assets), but only to the extent necessary for legitimate business purposes and with a contractual prohibition of using the Employee Data for any other purpose;
- ***Allegis Group companies*** – disclosures to Allegis Group companies for purposes consistent with this Notice; and
- ***Clients*** - when we place Employees with an Allegis Group Client, we may need to disclose certain Employee Data (including without limitation, the Employee's resume or to the extent permitted by law, the results of any criminal background checks, credit checks or drug testing results or other specific Employee Data such as SSN/National ID) with that client to facilitate and enable the placement. The Allegis Group Client will process such Employee Data in accordance with its own policies and procedures notified to the Employee.

7.3 We take precautions to allow access to Employee Data only to those Employees and third parties who have a legitimate business need for access.

7.4 Each Allegis US entity remains responsible for transfers to a third party acting as an agent on its behalf consistent with the Privacy Shield Framework. Each Allegis US entity complies with the Principles for all onward transfers of Employee Data from the EU and Switzerland, including the onward transfer liability provisions.

8. **Questions and Complaints**

8.1 We will address questions and complaints regarding Employee Data promptly and in accordance with applicable law. If you have a query or complaint please contact privacyofficer@allegisgroup.com or privacyofficerEU@allegisgroup.co.uk.

9. **Updates to this Notice**

9.1 This Notice was last updated on April 13, 2017. If we update this Notice in a material way, we will post a notice on the intranet for at least 30 days.