

# Privacy Notice

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(“the Company”, “we”, “us”, “our”) has engaged TalentWise (“Sterling”) to collect and process certain personal information about you in order to conduct a background check in connection with your employment, contractual or other relationship with us or services provided to us. For further information on the specific background checks that will be conducted, please speak with your contact at the Company.

This notice is intended to inform you about the personal information Sterling will collect and process on our behalf.

## What information do we and Sterling collect about you?

Sterling typically collects the following types of personal information when conducting background checks on our behalf:

- Identification information
- Address information
- Right to work / work permit information
- Education history and qualifications
- Employment history, including, where applicable, fiduciary or directorship responsibilities
- Personal and Professional references
- Professional qualifications and registrations with professional bodies
- Publicly sourced information (e.g. media information)
- Driver’s license and status, including driver history and expiration date

Additionally, Sterling typically collects the following types of personal information when conducting background checks which may be considered sensitive personal information:

- National identification numbers
- Sanctions with professional bodies
- Criminal history
- Financial information such as credit history, bankruptcy or financial judgments
- Appearance on global sanctions or terrorist watch lists
- Driving penalties and restrictions

<input type="checkbox"/> By checking this box and continuing to provide my personal information, I consent to the processing of my sensitive personal information.
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The type of information that is collected in your particular case may only involve certain types of information listed above. This will depend on the specific background checks that will be carried out. This is determined by us and may vary dependent on the role for which you have applied. For further information on the specific background checks that will be conducted in your particular case, please speak with your contact at the Company.

## How will we and Sterling use the information about you?

When conducting the background checks, Sterling will verify that the information you have provided to both us and Sterling is accurate and complete. In doing so, Sterling may need to share your information with, and obtain information from, Sterling’s affiliates, agents and other third parties, which may include your current and previous employers, education institutions, and professional bodies and associations of which you are a member; as well as credit reference agencies, fraud prevention agencies, public bodies and other publicly

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available sources, as appropriate and necessary. Where applicable to your situation, this may include queries abroad depending on the locations you have lived, worked or studied as indicated by you.

Sterling's data entry, order fulfillment, quality assurance, client service, finance and compliance teams may use your personal information to complete the background checks and communicate with you. In some cases, Sterling may use service providers to complete the background checks. Sterling only chooses service providers who prioritize the protection of personal information and who pass the strict organizational and technical security standards that Sterling sets.

If you intend to provide Sterling with the details of an individual to provide a reference, please make sure to obtain consent from that individual prior to passing their personal information to Sterling.

Sterling will never sell or disclose your personal information for marketing purposes or use your personal information in a way not described in this notice without your permission unless required by law. This may include requests for information made by local courts, law enforcement or national security authorities in places where the information is accessed or processed.

## When we and Sterling may need to transfer your information abroad

Data in Sterling's custody is stored in United States. Sterling's employees are located in operational centers in the United States, Canada, India, the Philippines and the United Kingdom, and your background check may be processed in one or several of those locations.

Sterling may need to transfer your information to countries not listed above for the purpose of conducting your background check. This may be the case if you have lived, worked or studied abroad and Sterling has been instructed by us to verify your personal information from those countries as part of the background check. Sterling may additionally need to transfer your information abroad for translation services where a language other than English is required or to engage the services of specialized firms to conduct certain types of background check.

If your information is transferred to countries that do not have a similar standard of data protection laws to yours, the Company and Sterling will ensure that your information is protected to at least the same standards as in your country of residence. For more information about how Sterling handles international data transfers, please click here: <http://Sterling.com/About/Privacy.aspx>.

## How does Sterling keep your information secure?

Sterling takes the security of your personal information very seriously. Sterling has advanced security measures in place to secure and protect your personal information, such as multiple layers of firewalls and alert systems to ensure your personal information is kept as secure as possible, as well as specialized devices to detect and prevent intrusion attempts, and encryption systems to ensure data is scrambled while being transmitted between systems. Sterling's data servers are located within a securely managed infrastructure which is ISO 27001/2 certified. Sterling's secure online delivery system is password protected and ensures that unauthorized individuals are not given access to personal information.

Sterling employs equally rigorous physical security policies to prevent physical access to its data centre. Any personal information in hard copy form is securely kept in lockable, non-portable storage systems that are accessible only to named individuals.

All of Sterling's employees have been carefully screened and undergo thorough security and privacy training. Sterling restricts access to your personal information to a limited number of individuals. Sterling also audits third party service providers with which it may need to share your personal information.

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## How long will we and Sterling keep your information?

Your personal information will be kept by the Company and Sterling for as long as needed to conduct the background checks or for legal, regulatory or contractual requirements we or Sterling may have to meet. This is to allow for audits and for the resolution of any disputes and complaints. Where Sterling retains your personal information for its own legal, regulatory or contractual purposes, Sterling is responsible for how your personal information is handled.

## Choosing not to provide your information

Providing your information is strictly voluntary. Choosing not to provide your personal information will mean that we cannot conduct a background check on you. For further information on the consequences of your choice not to provide your personal information to Sterling, please speak with your contact at the Company.

I choose not to provide my personal information

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*[check the box and return the form – do not provide your personal information – do not sign the consent below]*

## Your rights

You have the right to access your personal information, dispute its accuracy or completeness, be told its sources and to whom it has been disclosed, and to modify or withdraw your consent for its collection, use and disclosure. You also have the right to ask questions or complain about how we or Sterling handle your personal information. To do any of these things, please speak with your contact at the Company or Sterling which will refer your request to us using the details below:

Sterling Talent Solutions  
6111 Oak Tree Blvd.  
Independence, OH 44131  
1-888-889-5248  
[dispute.resolution@sterlingts.com](mailto:dispute.resolution@sterlingts.com)

## Consent and authorization

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I understand and authorize the following:


- Sterling will carry out the background checks requested by the Company on our behalf, and will make all information obtained through these checks available to us. I understand that these checks may include overseas queries as detailed above.
- Sterling may need to share my information with, and obtain information from, the following sources as necessary and appropriate for carrying out the background checks on our behalf: current and previous employers, education institutions, professional bodies, credit reference agencies, fraud prevention agencies, public bodies and other publicly available sources. Where necessary, I authorize Sterling to act as my agent in order to share or obtain my personal information when carrying out the background checks.
- The Company, Sterling and their affiliates may need to transfer my information to, and process my information from, certain countries as explained in the Privacy Notice in order to carry out the background checks. While the Company and Sterling will make every effort to protect my personal information, I acknowledge that these countries may not have a similar standard of data protection laws to my own country of residence.

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I declare that the information I have provided and will provide to the Company and to Sterling as part of the background check is complete and accurate in every respect. I understand that a false statement or omission of facts may affect my eligibility for employment, contractual or other relationship with the Company, or may otherwise impact my assignment or intended assignment to the Company.

I have read and understand the above statements regarding the processing of my personal information.

<p>Candidate Signature (print name below)</p> <p><b>X</b> </p>	<p>Date (YYYY.MMM.DD)</p> 