

# **North America (Excluding California) Privacy Notice for Employees and Job Applicants**

*Effective Date: January 1, 2023*

## **Introduction**

Allegis Group and its group companies which include those listed [here](#) (collectively, "Allegis Group", "we", "our" or "us") are committed to safeguarding your privacy.

"Personal Information" consists of information which may directly or indirectly identify you. This North America (excluding California) Privacy Notice for Employees and Job Applicants ("Employee Privacy Notice") is designed to assist you in understanding how we collect, use, disclose, share, and safeguard your Personal Information, and to explain the choices and rights that are available to you.

***Please review this Privacy Notice carefully.*** From time to time, we may change this Employee Privacy Notice. If we do, we will post an amended version on our webpage and on our intranet policy page. You also may receive a copy at any time by contacting us at [privacyofficer@allegisgroup.com](mailto:privacyofficer@allegisgroup.com).

## **Accessibility**

We are committed to ensuring this Employee Privacy Notice is accessible to individuals with disabilities. If you wish to access this Employee Privacy Notice in an alternative format, please contact us as at [privacyofficer@allegisgroup.com](mailto:privacyofficer@allegisgroup.com).

## **Scope of Employee Privacy Notice**

### *When This Employee Policy Notice Applies*

This Employee Privacy Notice applies to employees and job applicants of Allegis Group in North America who are not from California.

### *When This Employee Privacy Notice Does Not Apply*

This Employee Privacy Notice does not apply if you are from California.

If you are a California resident who is an employee or job applicant, please see our:

- [California Privacy Policy for Employees and Job Applicants](#)
- [California Notice at Collection for Employees and Job Applicants](#)

This Notice also does not apply to our collection and use of your Personal Information in a consumer or business-to-business capacity. For more information on our collection and use of

your Personal Information in that capacity, including how we process opt-out preference signals, please see our privacy notice available at <https://www.allegisgroup.com/en/privacy-notices/>.

## Personal Information We Collect

We currently collect and, in the 12 months prior to the Effective Date of this Employee Privacy Notice, have collected the following categories of Personal Information from you (what we specifically collect will depend on where you are in the job applicant to employment lifecycle):

- **Identifying Information:** such as your full name, gender, date of birth, marital status, employee ID number, signatures
- **Contact Information:** such as your Email address, telephone number, postal address, and contact information for you and for your referrals, references, or emergency contacts.
- **National Identifiers:** such as your SSN/National ID, Driver's License Number, passport and visa information and immigration status and documentation
- **Dependents' Information:** such as your dependents' and their respective names, address, date of birth and Social Security Number (SSN)
- **Educational and Professional Background:** such as your work history, resume/CV, academic and professional qualifications and history, certifications, language proficiencies, awards, security clearance information, and other work-related skills
- **Employment Details:** such as your job title, position, hire dates, base pay, bonus, commission, expense reimbursement, incentive pay and any other wage related information; performance and disciplinary records; timekeeping records including vacation and sick leave records; training records; and personality assessment information that you may take as part of the interview process or while you are an employee
- **Background Check Information:** such as your background check, credit check, education verification, employment verification, and/or drug testing results (where you have provided consent for such screenings)
- **Benefits Administration Information:** such as your benefits enrollment information, including Dependents' Information you provide
- **Career Planning Information:** such as your career interests, desired compensation and benefits, desired work location and willingness to relocate, family information you provide as it relates to your career goals or plans, hobbies and interests
- **Financial Information:** such as your bank account routing and account information, tax information, payroll information and withholdings, and credit card information (for example if you choose to provide it for booking a hotel for work travel)
- **Health and Safety Information:** such as your absence or leave records that contain health-related information (for example information about pregnancy, illness or other medical leaves of absence); information about your health as part of required occupational health screenings or related to a workplace injury; health information related to disability or other accommodation requests; health information related to COVID-19 symptoms, COVID-19 testing results, or COVID-19 vaccination status.  
Health information we hold about employees related to our self-funded medical plans is covered by our HIPAA Privacy Notice and not this Notice. You can obtain a copy of our HIPAA Privacy Notice from our intranet, our benefits website or by sending an email to [privacyofficer@allegisgroup.com](mailto:privacyofficer@allegisgroup.com).

- **Geolocation Information:** such as time and physical location related to your logging into our network or applications or using your badge to enter one of our office locations.
- **Biometric Information:** Your fingerprints (we will collect fingerprints only if we have provided you with a notice prior to collecting it that explains the reason for collection, which is usually for purposes of timekeeping or a security system). If a customer where you will be placed collects fingerprints, we will provide you with that information where we know it, but it is the customer's responsibility to notify you since they are collecting the fingerprint.
- **Characteristics of Protected Classifications under California or Federal Law:** Your race and national or ethnic origin, gender, and veteran status (for example in order to complete legally required EEO-1 or OFCCP reporting or other DEI company initiatives); disability status, information about religion (including religious dress and grooming practices and sincerely held religious belief, practice or observance), for example as part of a request for an accommodation; pregnancy and childbirth information (for example when you request FMLA leave or short-term disability); status as a victim of domestic violence, assault or stalking (if you request time off or an accommodation as allowed under law); union membership (if as part of working for one of our clients you are part of a union)
- **Audio, Visual or Similar Information:** Photographs (for example for your security badge, your photo for our intranet or photos of you at company events), video interviews, IS help desk phone call recordings, WebEx/Teams video and audio recordings and video captured by our security systems.
- **Device Information:** Your IP address, browser type and version, browser plug-in types and versions, operating system and platforms of the Allegis Group Electronic Resources (e.g., computers and other devices) you operate.
- **Other Information You Provide:** including any other Personal Information you may elect to provide to us.

## Sources of Personal Information

- **Information you submit to us:** Where we request information from you, we will inform you prior to collection whether the provision of the Personal Information may be provided on a voluntary basis, and the consequences of not providing the information, which may include being unable to properly provide you with Services.
- **Information we obtain from other parties:** We may receive or acquire information about you from other parties such as:
  - Websites and services like job boards and professional network sites (for example LinkedIn) and social media platforms and websites where you post information;
  - Clients (for example a client may provide current or prospective candidates for us to consider for a job they have asked us to fill);
  - Business intelligence sources, including data aggregators and list providers;
  - Your referrals and references (for example a referral who refers you to us for a potential job opportunity or a reference you provide to us);
  - Trade journals and news sources (for example industry publications); and

- Allegis Group affiliates, which are companies that have ownership in Allegis Group, that are owned by Allegis Group, or are under common control with Allegis Group.

Any Personal Information you provide to a third party will be subject to that third party's privacy notice and our use of the Personal Information we obtain from such third parties will be subject to this Privacy Notice.

We do not collect all categories of Personal Information from each source.

## Purposes for Collection

We currently collect and have collected the above categories of Personal Information for all purposes of providing employment, including to:

- Comply with applicable local, state and federal laws and regulations;
- Evaluate job applicants and candidates for employment;
- Evaluate suitability for temporary assignments with our clients, to facilitate such assignments and address any issues that may arise from them;
- Process payroll and/or travel and expenses;
- Obtain and verify background, credit and education checks and/or drug testing as well as employment references;
- Verify your ability to work in this country;
- Track time and attendance at work;
- Communicate with you regarding employment-related matters;
- Communicate with your family or other contacts in case of emergency or other necessary circumstance;
- Arrange business travel;
- Establish and manage training, professional development and employee recognition programs;
- Evaluate, make and communicate decisions regarding your employment, including decisions to hire, terminate, promote, demote, transfer, suspend or discipline;
- Administer, manage and maintain benefits, including group health insurance, retirement accounts, short-term disability, and other Company benefits and perks;
- Manage your job-related performance and/or employee conduct, including by engaging in lawful monitoring of your activities and communications;
- Investigate and handle workplace investigations (such as investigations of workplace accidents or injuries, harassment or other misconduct), disciplinary actions or termination;
- Administer and maintain our operations for safety purposes, including preventing the spread of illness and administer programs during a pandemic (e.g., COVID-19);
- Implement, monitor and manage electronic security measures (including detection of security incidents);
- Grant and monitor your access to secure company facilities;
- Verify and respond to consumer requests under applicable consumer privacy laws;

- Promote and foster diversity, equity and inclusion in the workplace;
- Perform workforce analytics, data analytics and benchmarking;
- Perform company audits;
- Engage in corporate transactions requiring review of employee records and information, such as for evaluating potential mergers and acquisitions;
- Maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance, including managing workers' compensation claims;
- Evaluate, assess and manage the Company's business relationship with vendors, service providers and contractors that provide services to the Company;
- Improve user experience on Company computers, networks, devices, software applications or systems, and to debug, identify and repair errors that impair existing intended functionality of our systems; and
- Exercise or defend our legal right.

## **Disclosure of Personal Information**

The following identifies the categories of Personal Information that we disclosed for a business purpose in the 12 months preceding the Effective Date of this Employee Privacy Notice and, for each category, categories of recipients to whom we disclosed Personal Information. For all of the Personal Information categories below except for Biometric Information, we may disclose, as appropriate under the circumstances, to government or law enforcement entities and lawyers.

- **Identifying Information and Contact Information:** Clients and potential clients; vendors, contractors and other service providers who assist us in providing our Services (e.g., IT operating system and platform vendors, SaaS vendors such as applicant tracking, back-office solutions, security vendors, data analytics providers, insurance vendors, company banks, benefits providers); Allegis Group affiliates; auditors, consultants and other professional advisors
- **National Identifiers:** Clients and potential clients; vendors, contractors and other service providers who assist us in providing our Services (e.g., IT operating system and platform vendors, SaaS vendors such as applicant tracking and back-office solutions, security vendors, data analytics providers, insurance vendors, company banks, benefits providers); Allegis Group affiliates; auditors, consultants and other professional advisors
- **Dependents' Information and Benefits Administration Information:** Vendors, contractors and other service providers who assist us in providing our Services (e.g., IT operating system and platform vendors, SaaS vendors such as human capital solutions and back-office solutions, security vendors, insurance vendors, company banks, benefits providers); Allegis Group affiliates; auditors, consultants and other professional advisors
- **Education and Professional Background:** Clients and potential clients; vendors, contractors and other service providers who assist us in providing our Services (e.g., IT operating system and platform vendors, SaaS vendors such as applicant tracking and back-office solutions, security vendors); Allegis Group affiliates; auditors, consultants and other professional advisors
- **Employment Details and Career Planning Information:** Clients and potential clients; vendors, contractors and other service providers who assist us in providing our Services (e.g., IT operating system and platform vendors, SaaS vendors such as applicant tracking, human capital

solutions and back-office solutions, security vendors); Allegis Group affiliates; auditors, consultants and other professional advisors

- **Background Check Information:** Clients and potential clients (where you have authorized releasee); vendors, contractors and other service providers who assist us in providing our Services (e.g., IT operating system and platform vendors, SaaS vendors such as applicant tracking, human capital solutions and back-office solutions, security vendors); Allegis Group affiliates; auditors, consultants and other professional advisors
- **Financial Information:** Vendors, contractors and other service providers who assist us in providing our Services (e.g., IT operating system and platform vendors, SaaS vendors such as human capital solutions and back-office solutions, security vendors); Allegis Group affiliates; auditors, consultants and other professional advisors
- **Health and Safety Information:** Vendors, contractors and other service providers who assist us in providing our Services (e.g., IT operating system and platform vendors, SaaS vendors such as human capital solutions, security vendors); Allegis Group affiliates; auditors, consultants and other professional advisors
- **Geolocation Information:** Vendors, contractor and other service providers (e.g., badge entry information systems, security vendors); auditors, consultants and other professional advisors
- **Biometric:** Not disclosed
- **Characteristics of Protected Classifications under California or Federal Law:** Vendors, contractors and other service providers who assist us in providing our Services (e.g., IT operating system and platform vendors, SaaS vendors such as human capital solutions, security vendors); Allegis Group affiliates; auditors, consultants and other professional advisors
- **Audio, Visual or Similar Information:** Vendors, contractors and other service providers (e.g., Company intranet system (for photos), video conferencing providers, security providers); auditors, consultants and other professional advisors
- **Device Information:** Vendors, contractors and other service providers (e.g, IT operating and system and platform vendors; networking monitoring systems; security providers); auditors, consultants and other professional advisors

We disclosed Personal Information to the above categories of recipients for all of the business or commercial purposes identified in the above “*Purposes for Collection*” section.

We have not sold Personal Information in the twelve (12) months preceding the Effective Date of this Employee Privacy Notice.

We do not knowingly collect, sell, or share the Personal Information of individuals under 16 years of age.

## **Retention of Personal Information**

We retain your Personal Information for as long as necessary to fulfill the purposes for which we collect it, such as to provide you with services you have requested, and for the purpose of satisfying any legal, accounting, contractual, or reporting requirements that apply to us. Please contact us as described in the “**How to Contact Us**” section below for more information on our employee data retention schedule.

## **Other Relevant Policies, Including Monitoring**

When we hire you, we provide you with other policies and procedures that govern your use of our offices, networks, computers, and other devices. We have the right to monitor your use of our offices and electronic resources in accordance with those policies and procedures.

For more information, please read our Acceptable Use of Electronic Resources, Bring Your Own Device Policy, Personal Data Protection Policy, Social Media Policy, Workplace Monitoring Policy and our Employee Handbook. You can find copies of these policies on our intranet or by contacting your local Human Resources contact.

### **How to Contact Us**

To contact us for questions or concerns about our privacy policies or practices please email [privacyofficer@allegisgroup.com](mailto:privacyofficer@allegisgroup.com)