

Allegis Group Online Privacy Notice

Effective Date: December 13, 2019

Allegis Group and its group companies which includes those listed here <u>click here</u>, (collectively, "Allegis Group", or "we") are committed to safeguarding your privacy. In this Online Privacy Notice ("Notice") we explain to you what information we may collect, use, share, and store about you, and the choices and rights that are available to you. If you have any questions about this Notice, please contact us using the contact details provided below at <u>'Contact Us</u>'.

We participate in and comply with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework as supervised by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Economic Area ("EEA") member countries, United Kingdom, and Switzerland to the United States, respectively. You can find out more about our Privacy Shield commitments below, <u>click here.</u>

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About Allegis Group

Allegis Group forms partnerships with organizations across the globe to optimize talent attraction and retention. We work with clients to help them achieve their talent strategies and business goals, and we help potential candidates fulfil their career aspirations.

Our services include:

Staffing and Recruiting	Contract, contract-to-hire, and direct placement solutions to secure the best talent for every business need.
Search	Search and executive placement services ensure you obtain the right talent to move your business forward.
Talent Advisory	Insight and advice on how to best attract and retain a high-performing workforce. Facilitating online career education for talent to bridge any skill gaps for desired opportunities.
Managed Delivery	Managed, project-based, and outsourced delivery services for IT, engineering, clinical, and sales and marketing initiatives generate measurable results for your business.
Workforce Management	Permanent and contingent workforce solutions, including recruitment process outsourcing (RPO), managed service provider (MSP) solutions, and vendor management system (VMS) implementation to optimize your human capital strategies.
Transformation	Hands-on technology solutions, strategic planning, and implementation so companies can innovate to take advantage of a new world of opportunity.



Learn more about the specific services for each of our brands at https://www.allegisgroup.com/en/brands

When this Notice Applies

"Personal information" consists of information which may directly or indirectly identify you. This Notice applies to our collection, use, and disclosure of your personal information:

- through our website(s) and related applications and content that link or refer to this
 Notice (including the Allegis Group websites listed here: <u>Allegis Group websites</u>); and
 Allegis computer or mobile software applications ("apps") and content made available to
 you) (collectively the "Sites");
- in connection with any of our events or sales, marketing, advertising, and recruitment activities, or in the course of providing other Allegis Group Services to you (collectively with the Sites, the "Allegis Services"); and
- when receiving services from you.

In some cases, we may provide additional data privacy notices specific to certain products, practices, or regions. Those terms are to be read in conjunction with this Notice. This Notice does not apply to the practices of third parties that Allegis Group does not own or control.

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Collection and Use of Personal Information

Categories of Individuals Whose Personal Information We Process Includes:

- **Visitors:** individuals who visit or use our Site(s) or any other Allegis Group Services, so that we can provide them with the Site(s) or Allegis Group Services they require;
- Job seekers: individuals that apply for job opportunities with Allegis Group to fill our internal positions or as part of our staffing and recruiting services or with Allegis Group's customers through our search, workforce management, or talent advisory services (in each case, whether such applications are made online or offline);
- Customers, vendors, service providers, and other suppliers: employees, representatives and/or agents of our customers, service providers, vendors, and other suppliers or individuals with whom we have a business relationship and/or manage on behalf of our customers; and
- Referees and others who advise on the suitability of job seekers: If you submit any
 personal information relating to other people to us or to our service providers in
 connection with the Allegis Services, you confirm that you have the authority to do so
 and to permit us to use the information in accordance with this Notice.



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How We Collect Information Includes:

- Information submitted directly: Allegis Group collects personal information that individuals provide to us through our Services, for instance by completing an online form or creating an account on our Site(s). 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.
- Information we collect automatically: Allegis Group and our service providers may automatically collect certain technical information from visitors to our site(s) and users of our app(s) by, for example, our use of cookies placed on your device.
- Information we obtain from other sources or third parties: We may receive or
 acquire information about our visitors, job seekers, customers, and service providers
 from third-party partners (such as background check providers and providers of
 professional databases) or a job seeker's, customer's, or vendor's third-party reference.
 Additionally, we collect information from our social media online forums, blogs, and
 message boards when you choose to interact with them. In addition, we collect personal
 information you make available on your public social network profiles and other public
 locations, including, for example, Facebook, LinkedIn, Twitter, Instagram, or other
 company websites and/or job boards.

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The Types of Personal Information We Collect Includes:

Category of Personal Information	Types of Personal Information	Business Purposes
Information	Identifying Information: includes name, username and password, citizenship status, and government issued IDs	 To create, manage, and administer the Allegis Group Services and for internal operations. To provide information on goods and services you have requested. To match job seekers to job positions. To match job positions to job seekers. To meet our legal obligations when acting as an employer and potential employer To make contact in an emergency. To help you search and enroll in career education classes.
Identifiers	Contact Information: includes email address, telephone number, postal address, and contact information of referrals, references, or emergency contacts	 To notify you about changes to our Site(s) or other Allegis Group Services. To personalize and deliver content about our Services to you. To send you e-mails, SMS messages, and other promotional communications about Allegis Group through marketing, advertising, and promotions, for example, newsletters, surveys, articles of interest, press releases, and job fair or other event announcements according to your marketing preferences. To comply with applicable laws and government regulations. To create anonymized aggregated statistics. To deal with disputes and take legal action or other professional advice.



Professional, Employment- related, and Educational	Professional Information: includes resume or C.V., employment history, education history, certifications, language proficiencies, awards, security clearance information, work authorization, and other work- related skills Preference Information: includes career interests, desired compensation, desired work location, hobbies, interests and benefits	Same as above.
Audio, Visual, or Similar Information	Audio, Visual, or Similar Information: includes video interviews, phone call recordings, and video captured by our security systems	Same as above.
Inferences	Inference Information: includes assessments of attitudes and abilities	 Same as above. To combine information within this table to create holistic profiles of our customers and talent to personalize our Services and tailor them to each customer's and talent's preferences and habits.
Commercial Information	Transactional Information: includes purchasing, sales, transactions, taxes, purchases and spending habits	 Same as above. To enhance, improve, or modify the provision of our Services and Sites, for our customers. To identify usage or purchase trends. To maintain market awareness.
Characteristics of Protected Classes	Demographic Information: includes race and national or ethnic origin, gender, disability status, and veteran status	 To deal with disputes and take legal action or other professional advice Where we are required to or permitted to do so by law for equal opportunity monitoring or affirmative action programs.



Internet or Other Electronic Network Activity and Geolocation

Computer Device

Information: includes IP address, browser type and version, time zone setting, browser plug-in types and versions, operating system and platforms

Behavioral Information: includes length of visits to

includes length of visits to certain pages and results from surveys

- To protect the Allegis Group Services.
- To conduct data analysis, audits, fraud monitoring and prevention, to develop new products, services and offerings meant to enhance, improve or modify our Sites. For more information about what we collect please see the <u>Cookies and Online</u> <u>Tracking</u> section of this Notice.
- To provide and administer the Allegis
 Group Services and for internal operations
 (for example, audit, troubleshooting, data
 analysis, statistical, and survey purposes).
- To ensure network and infrastructure security.

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Sensitive Personal Information

You may be asked for types of personal information that are viewed by some countries as sensitive personal information. Sensitive personal information includes, for example, government- issued identification numbers (such as national insurance numbers), information relating to a person's race or ethnic origin, political opinions or religious or philosophical beliefs, physical or mental health or condition, sexual orientation, trade union membership, genetic data, and any related legal actions. Allegis Group will process that personal information in accordance with applicable data protection laws.

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Failure to Provide Information Where Required

There will be times when we request information from you in order to provide Services. If you do not provide the information that we have identified as required, we may be unable to properly provide you with these Services.

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Legal Basis for Processing Personal Information

Our legal basis for processing personal information about individuals from the European Economic Area will depend on the type of personal information and the purpose for which we collect it. However, we will normally collect personal information from you only where:

- We need the personal information to perform a contract with you;
- the processing is in our legitimate interest and not overridden by your rights;



- we have your consent to do so; or
- there is a legal obligation to collect personal information from you.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

If we collect and use your personal information in reliance on our legitimate interests (or those of any third party), this interest will normally be to operate our platform and to communicate with you as necessary to provide our services to you and for our legitimate commercial interest; for instance, when responding to your queries, improving our services, undertaking marketing, or for the purposes of detecting or preventing illegal activities. We may have other legitimate interests and if appropriate we will make clear to you at the relevant time what those legitimate interests are.

You may choose to provide your personal information with Allegis Group for a particular position for which you are not successful. In such a situation, as you have indicated that you are looking for opportunities beyond your current role, Allegis may retain your personal information in order to present you with other opportunities for which your experience may be suitable. If you have concerns about Allegis Group retaining this data for these purposes please discuss them with your contact at Allegis Group.

If you would like further information on our legitimate interests as applied to your personal information, please "Contact Us".

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Sharing Your Personal Information

Allegis Group does not sell your personal information. Allegis Group may share and disclose personal information about you in the following circumstances:

- Potential employers or potential customers We may share your personal information at your direction if you are a job seeker with a customer for the purpose of providing Services (such as staffing and recruiting services, or search, workforce management, or talent advisory services). To the extent you are employed by a customer of Allegis Group through our search, workforce management, or talent advisory services, the Allegis Group customer will process such personal information in accordance with its own policies and procedures.
- Compliance with laws, government, and law enforcement We may disclose
 personal information where we are legally required to do so in order to respond to or
 comply with any applicable law, regulation, subpoenas, court orders, legal process, or
 government requests, including in response to public authorities to meet national
 security or law enforcement requirements.
- Vendors, consultants, and other service providers We use vendors, consultants, and other service providers to assist us in providing the Allegis Services, and it may be



necessary for us to provide access to your personal information (for example, IT vendors who support our systems, background check vendors, and premises security management for video security and badge access).

- Business transfers and corporate reorganization Circumstances may arise where, whether for strategic or other business reasons, Allegis Group decides to sell, buy, merge, or otherwise reorganize businesses. Such a transaction may involve, in accordance with applicable law, the disclosure of personal information to prospective or actual purchasers, or the receipt of it from sellers. It is Allegis Group's practice to seek appropriate protection for information in these types of transactions.
- Vital interests and legal rights We may collect and possibly share personal information and any other additional information available to us in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of Allegis Group's terms of use, or as otherwise required by law, including without limitation to meet national security or law enforcement requirements. We also may disclose your personal information when we choose to establish or exercise our legal rights or defend against legal claims.
- With your consent We may disclose your personal information for other purposes with your consent.

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Sharing Your Personal Information within Allegis

Allegis Group may disclose your personal information to any affiliate within Allegis Group for use in accordance with this Privacy Notice. This includes our subsidiaries, affiliates, and our ultimate holding company.

This sharing of personal information with Allegis Group affiliates may include combining the personal information gathered by certain Allegis Group Sites with information independently gathered on other Allegis Group Sites as well as information gathered offline into one or more database(s) useable by Allegis Group. Again, this combined information will only ever be used for the purposes disclosed within this Notice.

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Your Privacy Rights and Choices

We respect your right to access and control your information and we comply with applicable data protection laws and regulations. We will process your rights requests in compliance with applicable data protection laws and regulations. The availability of these rights and the ways in which you can exercise them are set out below.



European Privacy Rights

For individuals located in the European Economic Area ("EEA"), United Kingdom, or Switzerland your rights include:

- Access: You have the right to request access to your personal data. This enables you to receive a copy of the personal data we hold about you and certain other information about it.
- Rectification: You are entitled to request that we correct inaccuracies of your personal data.
- **Erasure:** You have the right to request erasure of your personal data in certain circumstances.
- Restriction: You are entitled to ask us to suspend the processing of certain of your personal data.
- Data Portability: You may request to receive information you provided to us in a machine-readable portable format or the transfer of certain personal data to another party.

You have the right to make a complaint to a Data Protection Authority where you are a resident, where we are based, or where an alleged infringement of data protection law has taken place.

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California Consumer Rights

For individuals located in California, you are given rights under the California Consumer Privacy Act (the "CCPA") about your personal information. You have the following rights:

- Right to be Informed About Collection, Sale, or Disclosure: You have the right to be informed of the categories of personal information we collect about you as well as the sources from which personal information was collected. You also have the right to be informed of the business or commercial purposes for which we use, disclose, or sell your personal information as well as the categories of third parties with whom we share it.
- Right of Access and to Obtain a Copy of Your Personal Information: You have the
 right to request access to and a copy of your personal information that we collected over
 the previous twelve months.
- **Right of Deletion:** You have the right to request that we delete personal data that we collected from you, subject to certain exceptions.
- **Right to Opt-out of the Sale of Personal Information:** Allegis does not sell personal information to third parties.



Right Not to Be Discriminated Against for Exercising These Rights: You have the
right to be free of discrimination for exercising your consumer privacy rights. We will not
deny you goods or services, charge different amounts or provide a different quality level
of goods or services for exercising your rights unless the difference is reasonably related
to the value of your data.

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Other Jurisdictions

Under the laws of some jurisdictions you may have the right to request additional information about the personal data we collect, request access to the personal data we process, correct an error or omission, delete personal data, or object or limit further processing. Allegis Group will respect individual rights requests under those laws.

Additionally, if we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. This will not affect any processing of your personal information done before you withdrew your consent.

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How to Exercise Your Privacy Rights

If you would like to exercise your privacy rights, please complete the web form here.

OR

Call +1 (844) 207-5571 to submit your request.

To protect your privacy and security, we may take steps to verify your identity. We will abide by all applicable legal requirements for deadlines for responding to your request. If you experience any issues with the web form or phone number, please contact datasubjectrequests@allegisgroup.com.

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Your Choices:

Marketing Communications: Where it is in accordance with your marketing preferences and applicable data protection laws, we may periodically send you updates via e-mail about promotional opportunities or services we think may interest you, such as jobs in our database that match your selection criteria, newsletters, white papers, surveys and event information. You can opt-out of receiving marketing emails from us.

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Shine the Light

California's Shine the Light law (Civil code 1798.83) permits users of our Sites that our California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request please contact us using the "Contact Us" section.

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Cookies and Online Tracking

Allegis Group websites use "cookies" and similar technologies (like web bugs) to help personalize your online experience and for analytics purposes. For more information about cookies, the types of cookies we use, and how we use them, please see our Cookie Notice.

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Security of Your Personal Information

Allegis Group is committed to protecting the personal information you share with us. Allegis Group uses appropriate physical, technical, organizational and administrative security measures to help protect your personal information from unauthorized or unlawful access, use, or disclosure, and from accidental loss, destruction, or damage.

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Data Retention

We retain personal information we collect from you where we have an ongoing business need to do so (for example, to provide you with the service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

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International Data Transfers

As a global company, we may transfer personal information within Allegis Group and third parties located in the United States and in other countries that may be outside your country of residence for storage and processing in order to provide the Services. These countries may not necessarily have data protection laws as comprehensive as those in your country or residence. In addition, we will have taken appropriate safeguards to protect your personal information in accordance with this Notice and applicable law wherever it is processed. These safeguards include implementing the European Commission Standard Contractual Clauses for transfers of



personal information between Allegis Group companies and our self-certification to the Privacy Shield Frameworks which are explained in further detail below. Further details of these safeguards can be provided upon request.

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EU-U.S. and Swiss-U.S. Privacy Shield Framework

For personal information we receive from the EEA, United Kingdom, and Switzerland, Allegis Group, Inc. and its US controlled subsidiary companies (for a full list of the US controlled subsidiary companies, click here) have certified their compliance to the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from the EEA, United Kingdom, and Switzerland transferred to the United States in reliance on Privacy Shield. We have certified that we adhere to the Privacy Shield Principles with respect to such data. If there is any conflict between the policies in this privacy notice under the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit https://www.privacyshield.gov/.

Allegis Group is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC) with regards to our compliance with the Privacy Shield.

In compliance with the Privacy Shield Principles, Allegis Group commits to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to Privacy Shield. Residents of the EEA, United Kingdom, or Switzerland who believe that their information has not been processed in compliance with the Privacy Shield Principles may raise their complaints in a number of ways:

 You should first contact us by completing this very brief web form <u>here</u>. Alternatively, use the contact details provided below and we will respond to your complaint within 45 days of receipt.

Allegis Group, Inc.
7301 Parkway Drive, 5th Floor Hanover, MD 21076
ATTN: Privacy Officer
privacyshieldconcerns@allegisgroup.com

Or if you are resident in the EEA, United Kingdom, or Switzerland:

Allegis Group Limited c/o Legal Department Maxis 2 Western Road Bracknell RG12 1RT ATTN: Legal Team privacyshieldconcerns@allegisgroup.com

(2) We have further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit http://www.bbb.org/EU-privacy-shield/for-eu-consumers for more information and to file a complaint. This service is provided free of charge to you.



(3) If your Privacy Shield complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See Privacy Shield Annex 1 at https://www.privacyshield.gov/article?id=ANNEX-I-introduction

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Children's Privacy

This site is not intended for use by children under the age of 13. Allegis Group does not knowingly collect personal information from children under the age of 13. If we learn that we have collected personal information from a child under the age of 13, we will delete that data from our systems.

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Links to Other Sites and Public Forums

Our Sites may contain links to other sites for your convenience and information. If you access those links, you will leave our Sites. Allegis Group does not control those sites or their privacy practices, which may differ from Allegis Group's practices. Allegis Group is not responsible for the privacy practices or the content of other websites outside of Allegis Group. The personal information you choose to provide or that is collected by these third parties is not covered by this Notice. We encourage you to review the policies of such third parties before submitting your personal information.

Allegis Group may make message boards, news groups, and/or public forums available to users on its Sites. Any information that you disclose in these areas becomes public information that may be accessed by third parties; therefore, you should use caution before deciding to disclose any personal information in these forums.

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Contact Us

If you have any questions, please contact:

Allegis Group, Inc. 7301 Parkway Drive, 5th Floor Hanover, MD 21076 ATTN: Privacy Officer privacyofficer@allegisgroup.com

Or if you are resident in the EEA, United Kingdom, or Switzerland:

Allegis Group Limited c/o Legal Department Maxis 2 Western Road Bracknell RG12 1RT ATTN: Legal Team



privacyofficerEU@allegisgroup.co.uk

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Our Data Protection Officer

The Data Protection Officer is an independent advisor and supervisor of Allegis Group's data protection compliance. The DPO's advice is directed towards Allegis Group in the first instance. The DPO can be contacted at:

Attention: GDPR Data Protection Officer c/o Legal Department

Maxis 2 Western Road Bracknell RG12 1RT

ATTN: The Data Protection Officer

dpo@allegisgroup.co.uk

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Changes to this Notice

If we change this Notice, we will post the revised Notice on our sites, with an updated revision date. If we make significant changes to our Notice, we may also notify you by other means, such as sending an email or posting a notice on our home page. We will update the "Effective Date" at the top of this page to indicate the date from which any changes take effect.

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