

## Candidate Privacy Information Statement

*Last Updated: June 2024*

Welcome to Entegeee, Inc. If you have received this Candidate Privacy Information Statement (“**Privacy Statement**”) from us, you are currently listed as or may be about to become listed as a candidate within our candidate database.

We are a human resources service provider (described more in detail below), and, as you may expect, to properly perform our services, we collect and use information about you, and we want to be transparent about this.

We are committed to protecting and respecting your privacy, and this Privacy Statement describes, among other things, the types of information that we collect about you in the performance of our business, how we use such information, and your privacy rights in relation to the information about you that we handle. Please read this Privacy Statement carefully. There is an index below so you can go straight to the relevant sections if you prefer.

Please note that if you are accessing our website, you should also review our Terms of Use, Cookie Policy, and General Privacy Policy applicable to our website available at <http://www.entegee.com>.

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## Some terms to be clear about and general information

We need to be clear about how we use some words in this Privacy Statement.

It may seem obvious, but in this Privacy Statement, you will be referred to as “**you**”.

When we use “**us**,” “**we**,” “**our**,” or the “**Company**,” we mean Entegeee, Inc.

Another term we use from time to time here within is “**The Adecco Group**.” You should know our Company is part of The Adecco Group, an organization of related companies located across the world whom are all subsidiaries of the same ultimate parent company, Adecco Group AG (a legal entity based in Switzerland). The Adecco Group companies perform a range of services including but not limited to temporary staffing and direct hire placement services, payroll services, recruitment and selection services, testing solutions services, career transition services, talent development services, training and education services, outplacement and international mobility services. When referring to the entirety of The Adecco Group herein, we will say “The Adecco Group”. When we refer to the other companies within The Adecco Group, we say our “**affiliates**.”

When we refer to a candidate portal (“**Candidate Portal**”) or app (“**App**”) herein, we mean a portal or app for our candidates that may be used to leverage our services. When available and utilized, the Candidate Portal or App allows you to create a candidate profile and/or search and apply for jobs we post which may match your interests, skills, preferences, and/or experience.

Keep in mind this Privacy Statement is about information about people. Such information identifies or relates to you and includes facts about you and opinions about you and that you hold (“I’m a football fan” for example). This type of information is sometimes called “**Personal information**,” “**Personal Data**,” “**Personally Identifiable Information**,” or “**PII**.” We use the term “**Personal Information**” in this Privacy Statement. This Privacy Statement is not about information about the Company (although sometimes the two overlap).

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## What Personal Information do we collect and use?

As a candidate for job opportunities, we collect and use Personal Information about you as part of the recruitment process (for example, in order to evaluate your suitability for certain employment opportunities and to make hiring decisions). The categories of Personal Information that we collect include, but are not limited to:

- Identifiers: This includes your name (first and last), e-mail address, telephone number, physical address, copies of and documents evidencing your identity and eligibility to work in the United States or other location as applicable, as well as photos, videos, or other recordings of your attendance at a video interview or training or similar sessions, where applicable. This also includes your online user account details if you create an account with us (whether via our website, our App or otherwise).
- Education and Qualifications: This includes your resume, CV, cover letter, educational background, training courses and internships, work experience, skill sets (for example, foreign language skills), third-party employment references or referrals, and any other information you listed on your resume or CV.
- Correspondence and Feedback: This includes records of correspondence, if you contact us, feedback about you from our staff and third parties and where you give feedback on others, and your own feedback about us and our services through our satisfaction surveys.
- Social Media Information: This includes Identifiers and other information you choose to make available on your public profiles on social media (Facebook, Twitter, LinkedIn, etc.), and other public locations (Job Boards, company websites, etc.).
- Information You Choose to Provide to Us: This includes any other information you provide.

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## **Do we collect and use sensitive Personal Information?**

As a candidate, you are not required to submit information that may be considered sensitive including your race or ethnic origin or data concerning your health or sexual orientation. If you decide to provide us with sensitive Personal Information, we will handle the information according to the practices identified in this Privacy Statement and applicable law, and we reserve the right to delete the information from our databases.

As a candidate, you may be asked about your willingness to complete a drug or background screen or medical examination or whether you require any accommodations in the work place.

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## **How do we obtain your Personal Information?**

We often collect Personal Information directly from you. When you interview with us, email us, call us, or when you apply for a position (whether via our website, via our App, via third parties such as job boards or social media sites, or otherwise), we may collect Personal Information such as your Identifiers, Education and Qualifications, Correspondence and Feedback, Social Media Information, and any Information You Choose to Provide, described in further detail above.

We also collect Personal Information about you from third parties such as references you identify and/or service providers who assist us with our services, such as companies providing employment verifications. The Personal Information about you may include your Identifiers, Education and Qualifications, and Social Media Information, described in further detail above.

We also collect Personal Information about you from social media platforms (such as, but not limited to, Facebook, Twitter, LinkedIn), company websites, and other publicly available sources.

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## **Why do we collect and use Personal Information about you?**

As a candidate for job opportunities, we collect and use your Personal Information identified above in response to “What Personal Information do we collect and use?” for the following business purposes:

- finding potential suitable jobs/assignments for you to apply for or that you may be interested in, helping you with training, or facilitating the process of applying for jobs/assignments. This may include for example sending Identifiers and Education and Qualification information, such as your resume or CV, to prospective employers for their consideration and keeping you informed of future work opportunities by email, telephone, mail, text message, and/or other communication methods (note that messaging and data rates may apply for any SMS, MMS, and other electronic communications (typically, this is based on your carrier and service plan));
- for direct messaging or marketing via e-mail, text messaging, telephone, or otherwise;
- to further develop, test and improve our website, Candidate Portal, App, or other existing or new systems/processes to better serve you;
- to perform studies and statistical and analytical research, for example, to compare the effectiveness of our placement of candidates between different business sectors and geographies and seek to identify factors that can influence any differences we identify;
- to transfer data to third parties (see below);
- where necessary, to comply with any of the Company’s legal or contractual obligations;

- in order to:
  - promote the security and protection of people, premises, systems and assets;
  - monitor compliance with internal policies and procedures;
  - administer communications and other systems used by us or The Adecco Group (including internal contact databases);
  - investigate or respond to incidents and complaints;
  - promote internally that training sessions have taken place and utilize their content (in the case of photos or videos of training sessions), to market similar sessions internally and externally to third parties; and/or
  - participate in any potential or actual purchase or sale, or joint venture, of all or part of a business, that any member of The Adecco Group wishes to participate in; and/or
- for other purposes to the extent applicable law allows.

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## **Do you have to give us the Personal Information we ask for?**

You are not required to provide your Personal Information to us, but it would not be possible for us to work with you, or provide our services to you, if you do not provide us with a required minimum. It also may limit the services that you can receive from us if you choose to provide us with limited Personal Information.

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## **How long do we keep your Personal Information?**

We retain your Personal Information for the period necessary to fulfil the purposes set out in this Privacy Statement, based on customary human resource practices and in accordance with applicable legal and regulatory requirements.

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## **Do we share your data with third parties?**

As mentioned above, we may disclose your data to third parties in furtherance of our services.

We disclose your Personal Information in the following circumstances:

- To our suppliers. We engage suppliers to carry out administrative and operational work in support of our services and our relationship with you. The supplier(s) are

subject to contractual and other legal obligations to preserve the confidentiality of your data and to respect your privacy, and they will only have access to and use the data they need to perform their functions. Some examples of these suppliers include, for example, IT suppliers (who host or support our IT systems, including information about you), premises management companies (who look after physical security at our buildings, and therefore need to know about you to allow access to our buildings) and back office finance and accounting management providers (who need to handle details of certain individuals in order to process accounts payable and receivable). We also engage suppliers who provide technology services and solutions such as, for example, for video interview and skills assessment tools. We may disclose to our suppliers your Identifiers, Education and Qualifications, Correspondence and Feedback, Social Media Information, and Information you Choose to Provide.

- To other members of The Adecco Group. Our affiliated companies are located in or outside the country in which you reside; different members of the group fulfil different functions and as result your information will be shared with them for different reasons. For example:
  - information is shared with members of The Adecco Group that provide IT functions for The Adecco Group companies world-wide;
  - information may be shared with other affiliate companies of The Adecco Group locally and/or globally in furtherance of the services we or The Adecco Group provides. A list of the countries in which we operate is available in the “choose your country” function of our website at [www.adecgroup.com](http://www.adecgroup.com).
  - the Personal Information we disclose with other members of the Adecco Group may include your Identifiers, Education and Qualifications, Correspondence and Feedback, Social Media Information, and Information you Choose to Provide.
- To our clients/prospective employers. As a candidate, we will share your data with clients or prospective clients of ours who are offering jobs/assignments you may be interested in, or who we believe may be interested in your profile. We may disclose to our clients/prospective employers Personal Information such as your Identifiers, Education and Qualifications, Correspondence and Feedback, Social Media Information, and Information you Choose to Provide.
- Government & law enforcement. We also will share your data with government, regulators or law enforcement agencies if, at our sole discretion, we consider that we are legally obliged or authorized to do so or we believe it would be prudent to do so; and/or
- Corporate reorganization. As part of due diligence relating to (or implementation of) a merger, acquisition or other business transaction, we may need to disclose your data to the prospective seller or buyer and their advisers.

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## International Users

This Privacy Statement is intended for individuals located in the United States.

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## Your Rights

You have certain legal rights with respect to the Personal Information that you provide and/or which we obtain about you depending on the state/country where you reside. For example, if you are a resident of California, the California Consumer Privacy Act (“CCPA”) (Civil Code § 1798.100, et seq.) provides you with specific rights regarding your Personal Information depending on the nature of your relationship with us.

Where applicable, your rights include, among others:

- **Right to be informed about collection or disclosure of your Personal Information:** You have the right to be informed of the categories of personal data that we collect about you as well as the categories of sources from which the personal data was collected. You also have the right to be informed of the business or commercial purposes for which we use, disclose your personal data as well as the categories of third parties with whom we share that personal data, as set forth in this General Privacy Policy.
- **Right to access and obtain a copy of your Personal Information:** You have the right to request to have access to the Personal Information that we collected about you and obtain a copy of them under certain circumstances. If applicable, once we have verified your identity, we will disclose the specific pieces of Personal Information we collected about you in a portable and, to the extent technically feasible, in a readily useable format.
- **Right to delete your Personal Information:** In certain circumstances, you have the right to have your Personal Information deleted. You may make such a request at any time and we will evaluate if your request should be granted, however this right is subject to any legal obligations we may have to retain data. For situations where in accordance with the law, we determine that your request to have your personal data deleted must be granted, we will do so within the time limit set by the applicable data protection laws.
- **Right to opt-out of the “sale” or “sharing” of Personal Information:** We do not sell your personal data in the conventional sense. However, like many companies,

we may use analytics services that are intended to analyze your interactions with our website, based on information obtained from cookies or other trackers, including for delivering interest-based content to you.

### **You can opt out of the use of cookies on our website by using your browser**

Most browsers allow you to view, manage, delete, and block cookies for a website. You can find specific guidance on how to control cookies for common browsers linked below:

- [Google Chrome](#)
- [Mozilla Firefox](#)
- MacOS Safari [Desktop](#) or [Mobile](#)
- [Microsoft Edge](#)
- For information on additional browsers and device types please see <http://www.aboutcookies.org/> or <http://www.cookiecentral.com/faq/>

To learn more about certain cookies used for interest-based advertising by third parties, including through cross-device tracking, and to exercise certain choices regarding such cookies, please visit

- [Digital Advertising Alliance in the US](#)
- [Digital Advertising Alliance of Canada](#)
- [European Interactive Digital Advertising Alliance](#)
- [Australian Digital Advertising Alliance](#)

### **Managing Analytics cookies**

You can opt-out of having your anonymized browsing history within our websites or applications recorded by analytics cookies. We use the following service provider on certain of our websites and you can learn more about their privacy policies and how to opt-out of their analytics cookies by clicking on the link: Google Analytics: [Google's Opt-Out page](#)

You will need to set your preferences from each device and each web browser from which you wish to opt out. This feature uses a cookie to remember your preference, so if you clear all cookies from your browser, you will need to re-select your preferred settings.

- **Right to equal service for exercising your privacy rights:** Unless permitted by applicable law, we will not discriminate against you when you exercise your privacy



rights under the California Consumer Privacy Act or other applicable law, including by: denying you goods or services; charging you different prices or rates for goods or services, including through the use of discounts or other benefits or by imposing penalties; providing you with a different level of quality of good or services; or suggesting that you will receive a different price or rate for goods or services or a different level of quality of goods or services.

To exercise your rights, please use the contact information listed in the “How can you contact us?” section below.

## **Verifying Your Identity**

To exercise the rights described above, it may be necessary for us to verify your identity or authority to make the request and confirm the Personal Information relates to you. To exercise your rights, we will collect your name, e-mail and/or telephone to verify your identity. Upon receiving your request, we may also contact you via e-mail and/or other secured communication channel to verify your identity by asking you additional security questions in order to match your identity with the data we maintain about you.

For residents of California only, you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. Your authorized representative may be required to submit a declaration or affidavit demonstrating that they have the authority to act on your behalf.

Once we have verified your identity, we will disclose the specific pieces of Personal Information we collected about you, by mail or electronically, at your option, in a readily usable format that allows you to transmit the information from one entity to another entity without hindrance.

Please note that if we cannot verify your identity, we are not obligated to provide you or your authorized representative information regarding your Personal Information.

To submit a request or for more information on how to submit a request, please contact us using the information listed in the “How can you contact us?” section below. Making a verifiable consumer request does not require you to create an account with us.

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## **What about data security when using our App, the Candidate Portal, or our other systems?**

Although we aim to protect the security and integrity of the Personal Information we collect, we cannot guarantee or warrant that any information, during transmission through the Internet or while stored on our system or otherwise in our case, is 100% secure from intrusion by others. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us of the problem by contacting us using the information listed in the “How can you contact us?” section below.

You are solely responsible for keeping your login details to the App, the Candidate Portal, and any of our other systems safe, in particular the password that we have given you or that you have chosen. These login credentials are for your own use. You are not permitted to share your credentials or other account details with any other person(s).

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## **How can you contact us?**

If you have any questions or concerns regarding our Privacy Statement or would like to exercise any of the rights described above, please email us at [privacy@entegee.com](mailto:privacy@entegee.com), call us at 800.793.7657 option 6, or by visiting our privacy rights request webform at <https://adeccogroup.force.com/privacy/s/?bu=Adecco+Staffing>.

When you contact us to exercise your rights, we will need you to identify yourself before responding to your request. We take your privacy-related requests seriously and will deal with them promptly, including within any time period prescribed by applicable law.

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## **How do we handle changes to this Privacy Statement?**

This Privacy Statement is not, nor is it intended to be, a contract, nor does it create any legal rights or obligations beyond what applicable law mandates. Therefore, we may amend, interpret, modify, or withdraw any of the terms of this Privacy Statement. We shall publish any material changes to this Privacy Statement through appropriate notices either on our website or by contacting you using other communication channels.