

CLIENTS PRIVACY INFORMATION STATEMENT

Welcome to Spring Professional, brand for XPE Group NV, which in turn is part of The Adecco Group (for more information see [Legal info](#)). We look forward to working with you to help you to bring you in contact with the right candidate. As you'd expect, to properly perform our services, we collect and use information about you.

The Adecco Group and XPE Group are committed to protecting and respecting your privacy. This Client Privacy Information Statement describes your privacy rights in relation to the information about you that we process, as well as the steps we take to protect your privacy. We know it's long, but please read this Statement carefully. There is an index below so you can go straight to the bits you want if you prefer.

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Some terms to be clear about

First we need to be clear about how we use some words in this statement.

It may seem obvious, but in this Statement you will be referred to as **‘the Client’** or **‘You’**.

When we talk about **‘us’** or the **‘Company’** we mean Spring Professional, brand for XPE Group NV and Adecco Professional Staffing NV, which in turn are part of The Adecco Group, with its principal office located at Noordkustlaan 16B – 1702 Groot Bijgaarden (for more information see [Legal info](#)). The Company is part of the Adecco Group, the largest HR services provider in the world. Through its various companies and business lines the Adecco Group provides several HR (Human Resources) activities like staffing, secondment, payroll services, recruitment & selection, testing solutions, career transition, talent development, training & education, outplacement and international mobility (**‘our Activities’**).

To carry out our Activities the Company uses several IT systems.

Finally, this is a statement about information about people – like you. It includes facts about you, but also on the candidates you are searching for. It’s not about information about the Company (although sometimes the two overlap). This type of information is sometimes called ‘Personal information’, ‘Personally Identifiable Information’ or ‘PII’. We use the term **‘Personal Information’** in this Statement.

What personal information does the company collect and use?

Personal information that the company usually collects includes, but is not limited to:

- your name, your surname, your coordinates;
- if you contact us, in some cases we will keep a record of that correspondence;
- feedback about you from our staff and third parties; where you give feedback on others, we usually keep that too and that is also personal information about you (it’s your opinion after all);

- we may also collect information on your visits to our website/Portal including (but not limited to) your IP address, browser, timestamp, location, country traffic data, location data, weblogs and other communication data and the resources that you access. This information will make your visit to our website/Portal easier in the future. We might, for example, suggest jobs to you which are being handled by branches local to where you were when you contacted us;
- we may also collect information for marketing purposes and analysis, including information on how you respond to email, sms, phone and other marketing campaigns
- in some cases we will also collect sensitive personal information where we are permitted to do so by law (so in some countries we will ask you about your background for equal opportunities monitoring).

Why do we use personal information about you?

The company collects and processes personal information:

- To provide you with the services you expect us to, like finding you suitable candidates, or facilitating the process of recruitments/assignments. This means that we keep you informed of candidates by email, telephone, mail and/or other communication methods;
- with your consent we may also use your contact data for direct marketing for example via e-mail, messaging or telephone;
- to further develop, test and improve our website/Portal, or other existing or new systems/processes to better serve you; this mainly takes place in the context of new IT systems and processes, so that information about you may be used in the testing of those new IT systems and processes where dummy data cannot fully replicate the operation of that new IT system;
- 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 might influence any differences we identify;
- to transfer data to third parties (see below);
- where necessary, to comply with any legal obligation; and

- we may also process your information to:
 - a. promote the security and protection of people, premises, systems and assets;
 - b. monitor compliance with internal policies and procedures;
 - c. administer communications and other systems used by the Adecco Group (including internal contact databases);
 - d. investigate or respond to incidents and complaints;
 - e. in the case of photos or videos of training sessions, to report internally that the training sessions have taken place and their content (for example in internal updates) and also to market similar sessions internally and externally to third parties;
 - f. comply with obligations and rights and cooperate with investigations carried out by the police, government or regulators; and participate in any potential or actual purchase or sale, or joint venture, of all or part of a business or company, that any member of the Adecco Group wishes to participate in.

What does the law say about this?

We are required by law to have a ground set out in the law to process the information we hold about you.

When you are working with or through Adecco our processing of personal information for all these purposes is based on processing grounds like the performance of a contract to which the data subject is a party (purposes 1 and 6-7), processing necessary to comply with legal or regulatory obligations (purpose 6-7) and/or processing necessary in the legitimate interests of Adecco in exercising its and its staff fundamental rights to run a business in a way which does not unduly affect your interests or fundamental rights and freedoms (purposes 1-5 and 7). When processing is necessary for the legitimate interests of Adecco, we ensure that processing is conducted in such a manner that our legitimate interests outweigh any individual's interest. We shall only process your personal information other than on these grounds with your consent (a further processing ground).

Do you have to give us the personal information we ask for?

You are not obliged to provide your personal information to us, but it is more or less impossible for us to work with you and provide our services if you do not.

How long do you keep my personal information for?

The Company may (and in some circumstances must, depending on the type of data) keep your data for several years after you register with us. We will keep your information for the longer of the period required in order to meet our legal and contractual obligations.

The retention periods of your personal information depend on the respective purpose the data are processed for and the respective tool such personal information are processed in. It is not possible to outline the various retention periods in a reasonably intelligible format under this Policy. The criteria used to determine the applicable retention period are that we will retain the personal information set out in this policy for as long as (i) necessary for the respective purpose, (ii) necessary to carry out our business relationship with you, (iii) you have consented to, and/or (iv) required by applicable statutory retention laws.

Generally, we retain data concerning taxes and your contract of employment, financial information for 7 years. We retain sensitive personal data for no longer than is reasonably necessary.

Do we transfer your data to third parties?

As mentioned above, we usually disclose your data to third parties. This is done to complete the purposes set out above. We do this in the following circumstances:

- To our suppliers. We may, for example, engage a supplier to carry out administrative and operational work in support of our relationship with you. The supplier(s) will be subject to contractual and other legal obligations to preserve the confidentiality of your data and to respect your privacy, and will only have access to the data they need to perform their functions; the relevant suppliers are typically 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 may need to know about you to allow access to our buildings) and back office finance and accounting management providers (who might need to handle details of clients in order to process accounts payable and receivable). We may also engage suppliers who provide IT technology services and solutions, which might include video interview and skills assessment tools.
- To members of the Adecco Group of companies in other countries. These may be located in- or outside the European Union; different members of the group fulfil different functions and as result your information may be shared with them for different reasons:

- information is shared with members of the Adecco Group that provide IT functions for the Adecco companies world-wide; those IT functions are located among others in Prague, Czech Republic and France.
- information is also shared with Adecco affiliates world-wide where you have expressed an interest in opportunities in that market, or members of the Adecco Group identify that you may have particular skills required or helpful in that market. A list of the countries in which we operate is available in the ‘choose your country’ function of our website at www.adecco.com
- To our clients/prospective employers: we will share your data with clients of ours who are offering jobs/assignments you may be interested in, or who are interested in your profile. They owe contractual and other confidentiality obligations in relation to your data to us, and to you;
- We will share your data with government, police, regulators or law enforcement agencies if, at our sole discretion, we consider that we are legally obliged or authorised to do so or it would be prudent to do so; and
- 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.

Do we transfer your data outside the European Union?

Your data can be transferred and processed in one or more other countries, in- or outside the European Union. A full list of the countries in which we operate is available in the ‘choose your country’ function of our website at www.adecco.com.

We shall only transfer your data outside the EU to countries which the European Commission believes offers an adequate level of protection to you (a list of those countries is available here: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm), or where the Adecco Group has put in place appropriate safeguards to seek to preserve the privacy of your information (for which we usually use one of the forms of data transfer contracts approved by the European Commission, copies of which are available here: http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index_en.htm).

What are your rights?

- **Right to access and obtain a copy of your personal information**

You are entitled to request confirmation whether we process any of your personal information. Where this is the case, you may have access to some of your personal information and to certain information about how it is processed. In some cases you can ask us to provide you with an electronic copy of your information.

- **Right to correct your personal information**

If you can demonstrate that personal information we hold about you is not correct, you can request that this information is updated or otherwise corrected. We would encourage you to access the self-service Portal where possible and update your personal information directly.

- **Right to be forgotten/have data deleted**

In certain circumstances you have the right to request that we restrict the processing of your personal data and/or that your personal data is deleted. You may make such a request at any time and Adecco will evaluate if your request should be granted, however this right is subject to any legal rights or obligations we may have to retain data. For situations where in accordance with the law, we determine that your request to have your personal information deleted must be granted, Adecco will do so without undue delay. Please bear in mind, once your data is deleted – that the Company might not be of service to you anymore once this data about you has been deleted. If you want to re-register with the company again, you will need to re-enter your data.

- **Right to object**

As far as the company's processing of your data is based on the company's legitimate interest (and no other processing ground) or relates to direct marketing, you are entitled to object to the Company processing your data by reference to your particular situation.

If you want to exercise any of your rights, please log into the self-service Portal or email us at adecco.globalprivacy@adecco.com or contracts.legal@adecco.be.

When you email us to exercise your rights, the Company may ask you to identify yourself before actioning your request.

Finally, you have the right to lodge a complaint with the data protection authority in the place where you live or work, or in the place where you think an issue in relation to your data has arisen. In Belgium this is the Privacy Commission.

What about data security when using Adecco or XPE Group Systems?

You are responsible for keeping your login details to the Portal 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).

How could you contact us?

If you have any questions or concerns regarding our Statement, would like further information about how we protect your information (for example when we transfer it outside Europe) and/or when you want to contact the company's Group Data Protection Officer (DPO) and your local Privacy Lead, please email us at adecco.globalprivacy@adecco.com or your local Privacy Lead at contracts.legal@adecco.be.

How do we handle changes to this Statement?

The terms of this Statement may change from time to time. We shall publish any material changes to this Statement through appropriate notices either on this website or contacting you using other communication channels.

The Adecco Group team