Our Commitment to Data Protection

ALLEGIS GROUP

Our Commitment to Data Protection Regulations

Allegis Group, Inc. and its affiliated entities ("Allegis Group") have made compliance with Data Protection Regulation ("DPR") a top priority. Allegis Group has a dedicated global privacy program committed to respecting the privacy rights of individuals who entrust personal data to us.

Data Protection Regulations, such as the General Data Protection Regulation (GDPR), California Consumer Privacy Act (CCPA) and the recently passed California Privacy Right Act (CPRA), Personal Information Protection and Electronic Documents Act (PIPEDA), Australia's Privacy Act, ePrivacy Regulations (ePR), and the Philippines' Data Privacy Act, regulate the collection, handling, use and storage of personal data. Data Protection Regulations increase the obligations on organizations who collect or process personal data.

This document has been provided for informational purposes and is not intended to be a comprehensive overview of GDPR, CCPA, CPRA, PIPEDA nor is it intended to be construed as legal advice. Please consult your attorneys in connection with any fact-specific situation that takes into account such facts and applicable law.

Allegis Group's Data Protection Readiness Effort

At Allegis Group, we are committed to ensuring the responsible and secure collection, use and sharing of personal data. We are diligently working to develop, improve and maintain systems and processes to be compliant with various DPR with our Global Privacy Office leading our efforts.

About the Allegis Group Global Privacy Office

The Global Privacy Office's mission is to support Allegis Group's (including all operating companies) commitment to the appropriate collection, use and sharing of personal data. The Global Privacy Office has key leaders in the United States, EMEA and APAC that coordinate with our Global Privacy Officer, who is designated as a Fellow of Information Privacy (FIP). Our Global Privacy Officer is also CIPP-US, CIPP-C, CIPP-E and CIPM certified through IAPP. Additionally, each of our operating companies has a dedicated Privacy Analyst who assists with the implementation of the DPR readiness strategy in partnership with the Global Privacy Office. Each member of the team brings their subject matter expertise, including numerous IAPP certifications and deep knowledge of their respective businesses. Additionally, Allegis Group has a centralized Global Data Protection Oversight Committee comprised of its most senior leaders within Privacy, Legal, Human Resources, Finance, Compliance, Marketing, Strategy, Information Services, Information Security, and Corporate Development to oversee the company's global privacy initiatives.

Allegis Group is also proud to be an IAPP Gold Sponsor.

Our DPO

Our Data Protection Officer (DPO) under GDPR is Lillian Pang. Lillian Pang is an IAPP member and designated as a Fellow of Information Privacy (FIP). Lillian is also CIPP-E and CIPT certified. Lillian has worked in the data privacy field for over 10 years and previously worked for a global technology company as Vice President and Group Chief Privacy Officer. Lillian also has in-house counsel experience with the staffing industry and therefore has a strong understanding of our industry and our services. Lillian is based in London.

Where required by applicable DPR, we appoint other DPO's, for example we have appointed a DPO for Germany, Canada, New Zealand, Singapore and the Philippines.

Allegis Group's Data Protection Readiness Program

The Global Privacy Office is actively developing, improving and implementing its initiatives to make sure Allegis Group is compliant with DPR. Allegis Group's Global Privacy Office is approaching DPR Readiness through its commitment to its "Top 10 DPR Initiatives," which include:

Understanding Our Data – Data Mapping and Justifications for Processing

- Completion of data mapping exercises
- Completion of our Article 30 records of processing activities under GDPR
- Understanding where we "sell" personal data under CCPA

Data Breach Reporting

- Ensuring our privacy and security incident response process is prepared to respond within various DPR deadlines

Contracts – Customers and Suppliers

- Implementing DPR compliant provisions in our contracts with our customers and suppliers
- Conducting due diligence on our suppliers through questionnaires and, where appropriate, on-site or other forms of audit

Training and Awareness and Appointment of Data Protection Officer

- Appointment of Lillian Pang as Data Protection Officer under GDPR and appointment of other DPOs as necessary
- Online and in-person trainings and resources across thebusiness to promote privacy awareness and teach key privacy principles

Data Subject Rights and Consent/ Preference Management

- Implementing a repeatable, scalable process and set of procedures for handling data subject rights requests
- Implementing and adhering to consents and preferences expressed by data subjects

Data Transfers

- Ensuring we are maintaining viable means for transferring personal data, including maintaining a Global Intra-Group Data Transfer Agreement, based on the model clauses and Article 28 of GDPR, and executing model clauses where needed with customers and suppliers for the EU, Switzerland, and other jurisdictions that require them.

Data Minimization

- Ensuring that Allegis Group collects and keeps only data that is necessary for its legitimate business interests

Information Security

- Partnering closely with our Information Security team to implement appropriate technical and organizational measures to protect personal data, including looking for opportunities to enhance the use of anonymization, pseudonymization and encryption

Privacy in Day-to-Day Operations/ Privacy by Design and DPIA

- Undertaking Data Privacy Impact Assessments (DPIAs) where appropriate across the business
- Partnering with our Privacy and Protection team within IS for Privacy by Design
- Educating areas of the business (e.g., HR, Marketing, Procurement) on the meaning of privacy for their function in day-to-day operations

Privacy Notices

- Updating and distributing all privacy notices to remain in compliance with DPR

Our Services – When We Act as a Controller/ Business and/or Processor/Service Provider

Understanding the role that you play as either a Controller/Business or Processor/Service Provider is an important component of DPR. While each regulation has specific nuances, the following outlines our stance under each of GDPR and CCPA with regards to our service offerings.

Controller/Business: Determines the means and purposes of the processing of Personal Data (the "how" and the "why")

Processor/Service Provider: Processes Personal Data on behalf of the Controller/Business

Allegis Group has conducted an analysis to identify the role it plays for many of our service offerings as explained in the chart below:

	Staffing	Search	Consulting	MSP	RPO
Processor/ Service Provider?	No	No	Yes	Yes	Yes
What is the Personal Data?	N/A	N/A	Customer Personal Data – varies (depends what Customer provides to our Consultants)	Customer Personal Data – Staffing Supplier Contract Worker data (to provide short-listing/ evaluations, consolidated invoicing, analytics)	Customer Personal Data – Candidate data Customer provides to Allegis Group or directs Allegis Group to source on its behalf
Controller/ Business?	Yes	Yes	No	No	Yes
What is the Personal Data?	Contract Worker Data	Candidate Data			Candidate Data – sourced by Allegis Group (not at direction of Customer)

For each of our service offerings, we have developed data protection language that is compliant with DPR that we have ready for use with any customer engagement. We closely monitor developments related to DPR for how they impact our services and therefore the appropriate data protection language to utilize in contacts. We will continue to improve our language in response to new guidance, including for example, the guidance provided by the European Data Protection Board.

For additional information regarding the roles we play, please see the publications from the American Staffing Association which are accessible here.

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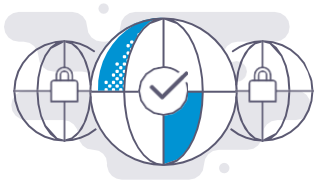
Transferring Personal Data

Allegis Group is committed to responsibly and lawfully transferring personal data while performing our services that involve data subjects from many different countries and regions. Allegis Group has the following mechanisms in place, for example, to handle transfers of personal data that involve data subjects from, for example, the UK, EEA and/or Switzerland:



Model Clauses

We make use of the EU Model Contract Clauses as appropriate with ourbusiness partners. Where a jurisdiction requires that we have data protection language in place, we develop and implement compliant language (for example, New Zealand).

Intra-Group Data Transfer Agreement

We have an Intra-Group Data Transfer Agreement using the EU Controller to Controller Model Clauses that also includes the appropriate provisions required under GDPR to cover personal data transfers between and among our businesses globally.

Privacy Shield Framework

We are EU-US and Swiss-US Privacy Shield certified and have been since the inception of the Privacy Shield Framework. Please see our Privacy Shield certification here. Prior to our Privacy Shield certification, we were certified under Safe Harbor from 2010-2015. In light of the recent judicial decision (Case C-311/18 Data Protection Commissioner v Facebook Ireland Limited and Maximillian Schrems (called "Schrems II"), we no longer rely on the Privacy Shield Framework to transfer data from the EU or Switzerland to the US. However, for over a decade we have built a strong privacy program to comply with these frameworks as part of our DPR readiness efforts and continue to benefit from the rigor of data protection requirements present in a framework like Privacy Shield. In addition, continuing to be part of the Framework provides a mechanism enabling individual complaints to be administered and addressed and the ability for EU data subjects to invoke arbitration in all cases where the action or inaction of the competent U.S. authorities (for instance the Federal Trade Commission) has not satisfactorily resolved their complaints.

We ensure an adequate transfer mechanism is in place when our suppliers are processing personal data outside of the EEA.

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GETTING HIRED

QuantumWork

As the global leader in talent solutions, we take pride in what we do, connecting great people to great opportunities, helping businesses win and careers soar. Today, with $12.3 billion in revenues and 500+ global locations, Allegis Group and its network of specialized companies provide a full suite of complementary talent solutions that solves nearly every workforce challenge to empower business success while consistently delivering an unsurpassed quality experience. Our companies include Aerotek; TEKsystems; Aston Carter; Allegis Global Solutions; Major, Lindsey & Africa; Allegis Partners; MarketSource; EASi; The Stamford Group; Getting Hired; and QuantumWork.

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