CLIENTS AND PROSPECTS PRIVACY INFORMATION STATEMENT

Latest Update: 12.2021

Adecco Group Norge AS and/or its applicable affiliated companies, Sjølyst plass 2, 0125 Oslo ("Adecco", "we" or "us") is committed to protecting and respecting your privacy.

This Statement (together with other documents referred to herein) describes what personal information we collect from you and how we process your personal information.

There is an index below, so you can go straight to the relevant section you want if you prefer.

Index:

Personal information we collect from you How we use your personal information Legal basis for processing your personal data How long we store your personal data Marketing communications Sharing with third parties IP addresses and cookies Where your personal information is stored and processed Do we transfer your data outside of Norway? Data Security Your rights. How you can access, correct and delete your personal information Changes to this Statement Contact

Personal information we collect from you

- We collect information that you provide to us directly, including contact information, such as first name, last name, e-mail address, job title and company name, as well as other information that could be on your business card (such as your company address and phone number) when you visit our website or talk to us at a conference or other event, or if you are a customer or prospective customer. We use the information you provide to deliver our products and services to send you information that you requested; or to contact you to provide additional information on our available products and services.
- We will collect personal information on your visits to the Site including, but not limited to, traffic data, location data, weblogs, content from surveys and contact forms and other communication data and the resources that you access. Our collection of this personal information will make your visit to the Site easier in the

future as we will be able to suggest Content that is relevant to you based on the location you access the Site from.

- We will automatically process some technical data such as your Internet Protocol (IP) address to identify what companies have interacted with the Site.
- We will collect any information you provide to us when you use our contact forms (for example "Contact", "Send us a Message" or "Stay in touch"). The provision of your personal information via our contact forms is not a statutory or contractual requirement; however, please note that fields marked with an asterisk (*) are mandatory fields, because we need this information to comply with or respond to your request. Other information or personal information you share with us when completing our contact forms is in your sole discretion. If you contact us, we will keep a record of that correspondence.
- When you use our online services, we also store cookies as set out in more detail in our Cookie Policy.

How we use your personal information

Your personal information will be collected and processed by us for the following purposes:

- to manage our relationship with your organization;
- to respond to your request or questions when you contact us;
- to send to you other information such as Adecco upcoming events or newsletters – that may be of interest to you;
- to send you direct marketing via e-mail when your company that you are working for is Adecco's client currently or in the past or when you opt-in for this purpose in the relevant contact form. You may opt-out of receiving future marketing communications at any time in both cases;
- to help us create, publish, and improve Content most relevant to you;
- to ensure that the Content provided through the Site is presented in the most effective manner for you and for your device;
- to allow you to participate in interactive features of our Site, when you choose to do so; and
- to further develop and improve the Site and systems to better serve you.

In summary, we will use your information to establish or strengthen a business relationship with you. This may include informing you of our services, products and events that would be of value to you.

Legal basis for processing your personal data

Our use of your information as described above is permitted by applicable data protection law because it is:

- necessary for our legitimate interests in pursuing the purposes set out above and such interests in each case not being overridden by your privacy interests;
- in some cases, necessary to meet our legal or regulatory responsibilities, such as disclosures to authorities, regulators or government bodies; or
- in some cases, necessary for the performance of a task carried out in the public interest and, when we use special categories of personal information, necessary for establishing, exercising or defending legal claims or where the processing relates to personal information manifestly in the public domain; or
- necessary for the performance of a contract to which you or your organization is party and manage and build the relationship between the parties; or
- processed with your consent which we obtain from you from time to time, such as when you opt-in to receive marketing communications and news via email. See further information about B2B Communications in "Marketing communications" section below.

We **do not** make any automated decisions solely on automatic processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

How long we store your personal data

When you use our contact forms or sign up for newsletters, events or get information from us, we will keep your information for two years after last contact. However, we may keep your information for the longer of the period required in order to meet our legal or regulatory responsibilities (for example, for establishing, exercising or defending legal claims or compliance cases).

The retention periods of your personal information depend on the respective purpose the data are processed for and the respective tool such personal information is processed in. If we are providing any type of services to your company, we will keep your information for ten years after the end of the relationship of the legal entities in order to comply with applicable statutory retention laws.

Marketing communications

We process your data within the scope of an existing business relationship with you or your company either (i) because we have a contract with you (or are considering entering into a contract with you);

We may obtain contact information from public sources, including content made public at social media websites, to make an initial contact with a relevant individual at a client or other company. However, the bulk of the personal data we collect and use for marketing purposes relates to individual employees of our clients and other companies with which we have an existing business relationship. When we can legally do so, we may augment your information in order to assure that it is accurate.

In other circumstances, we will only send marketing communications to you, as individual, normally by email where you have consented that we may do so.

Marketing communications via e-mail sent to individuals at our clients/companies with whom we want to develop or maintain a business relationship is sent in accordance with applicable electronic and marketing communications laws, and may include web beacons, cookies, and similar technologies that allow us to know whether you open, read, or delete the message, and links you may click on.

We will usually offer you a check box on the forms we use to collect your personal information where, if you agree to receive marketing communications, you have to click the box.

In any case, where we send marketing communications to you via email, you may opt out of receiving any further marketing communications by clicking the 'unsubscribe' or 'optout' function in the email. In addition, you can also exercise your opt-out right at any time by contacting us at privacy@adecco.no_and providing the following information: your name, your email address, a contact telephone number, the marketing communications you would like to opt out of receiving.

Sharing with third parties

To facilitate our efficient use of your information, and to provide you with the content and/or resources, we disclose your information to third parties. However, this disclosure will only occur in the following circumstances:

- To suppliers, contractors and agents: from time to time we engage or employ other companies and individuals to perform functions on our behalf. This category of third-parties includes:
 - MailChimp, mainly for marketing purpose. This supplier is located in the United States

Such recipients will only have access to your personal information as required by them to perform their functions and are not permitted to use such personal information for any other purposes. These recipients will be subject to contractual confidentiality obligations.

 To other entities belonging to the Adecco Group (i.e. any companies directly or indirectly controlled by Adecco). A list of Adecco Group companies is included here https://www.adeccogroup.com/worldwide-locations/ including their suppliers, contractors and agents, which can be involved in the provision of the Site or the content, so that we can better serve you or, simply, to give response to your requests (e.g. when you use contact us forms). The Adecco Group is an organization of related companies located across the world who are all subsidiaries of the same ultimate parent company, Adecco Group AG. 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. We may share your personal information with other members of The Adecco Group in furtherance of the services we or The Adecco Group provides.

• **To government or law enforcement authorities** if we determine in our sole discretion that we are under a legal obligation to do so.

IP addresses and cookies

We collect information about your computer, including (where available) your IP address, operating system and browser type, for system administration. This is statistical data about our users' browsing actions and patterns and does not identify you or any individual.

For the same reason, we obtain information about your general internet usage by using a cookie file which is stored on your device. Cookies help us to improve the Site and to deliver a better and more personalized content. For more information about our use of cookies on the Site, please refer to our Cookie Policy.

If your computer is shared with other people, we advise that you do not select the 'remember my details' option when that option is offered by the Site.

Where your personal information is stored and processed

As explained in the "Sharing with third parties" paragraph above, we share your personal information with the following:

- Third party suppliers, contractors or agents: where we use a third-party supplier, contractor or agent, your personal information remains under our control and we have controls in place to ensure your personal information is adequately protected.
- Other companies in the Adecco Group: we have entered into a groupwide arrangement to ensure your personal information continues to be subject to an adequate level of protection.

We endeavour to take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Statement.

Do we transfer your data outside of Norway?

Your personal information may be transferred to and processed in countries other than Norway. We shall only transfer your personal information to countries that provide an adequate level of data protection as defined by EU or Swiss laws or where we have put in place appropriate safeguards to seek to preserve the privacy of your personal information. When we transfer your information to recipients in these countries, we will protect that information as described in this Privacy Notice and will comply with applicable legal requirements. Those countries include France, Czech Republic, The Netherlands and United States.

Data Security

Although we will do our best to protect your personal information, you should be aware that the transmission of information via the internet is not completely secure and we cannot guarantee the security of your personal information transmitted to the Site or any third party; for this reason, any transmission is at your own risk. We will use strict operational procedures and adequate, technical and organizational security measures to prevent any unauthorized access, change, deletion or transmission of this personal information.

Your rights. How you can access, correct and delete your personal information

Under applicable data protection laws, you have the following 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 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. In some limited circumstances, you also have the right to request portability of your personal information.
- **Right to correct your personal information:** If you can demonstrate that personal information that we hold about you is not correct, you can ask that this information is updated or otherwise corrected.
- **Right to be forgotten/have data deleted**: In certain circumstances you have the right to have your personal data 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.
- Right to restrict or object to the processing of your data: In certain circumstances you have the right to obtain restriction of the processing of your

personal information, or to object on certain processing thereof on grounds relating to your particular situation.

You may click here to exercise your rights.

To the extent our processing of your personal information is based on your consent, you also have the right to withdraw your consent at any time. Withdrawal of your consent will not affect the lawfulness of any processing based on your consent before the receipt of such withdrawal.

You can also lodge a complaint about our processing of your personal information with the data protection authority of the Member State of your habitual residence, of your place of work, or of an alleged infringement of your rights.

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 Site or contacting you using other communication channels.

Contact

Questions, comments and requests regarding this Statement are welcomed and should be addressed to Adecco Group Norge AS, Sjølyst plass 2, pb 2013 Vika, 0125 Oslo, email address privacy@adecco.no

You can also contact our Local Privacy Lead at the following address: Sjølyst plass 2, pb 2013 Vika, 0125 Oslo.