

CLIENTS AND PROSPECTS PRIVACY NOTICE

Latest Update: 14. April 2023

Adecco Sweden AB (556447-2677) and/or its applicable affiliated companies (“Company”, “we” or “us”) is committed to protecting and respecting your privacy.

This privacy notice (‘Privacy Notice’) (together with other documents referred to herein) describes what personal information we collect from you and how we collect, use and process it.

We know it is long, but please read this Privacy Notice carefully.

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

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1. Some terms to be clear about

First, we need to be clear about how we use some words in this Privacy Notice.

It may seem obvious, but in this Privacy Notice, you will be referred to as ‘**You**’.

When we talk about ‘**us**’ or the ‘**Company**’ we mean Adecco Sweden AB. We have our registered office at Svetsarvägen 6, 171 41 Solna, Sverige. The Company is part of the Adecco Group AG (Adecco Group) with company headquarters at Bellerivestrasse 30, 8008 Zurich, Switzerland, 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. In some cases, the Company provides a Self-Service Portal ('**Portal**') for its clients. The Portal allows you to manage the relationship with the Company and its sister companies and look for candidates that fit your needs.

Finally, this Privacy Notice is about how we process your information as an individual. It is not about how we process information about companies (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**' or '**data**' in this Privacy Notice.

2. What information does the Company collect and use?

We collect and use information to provide the best possible opportunities that are tailored to you, which we have grouped together as follows:

- a) **Identity Data** means your first name, last name.
- b) **Professional Data** means your professional email address, professional phone number, company name, company address and phone number, job title, department, service, location of your office and other information that could be on your business card, and power of attorney.
- c) **Technical Data** means internet protocol (IP) addresses from which you access our or others products and services, cookies (as set out in our *Cookies Policy*), your login data (such as the time, date and duration), weblogs, the browser type and version you use to access our and others websites, apps and products and services, [traffic data], the time zone settings of your device and your device location, , browser plug-in types and versions that you use, [other communication data], the resources that you access on our websites, apps and products and services, operating system and platform of the device your use, and details of other technology on the devices you use to access this website and/or system.
- d) **Contact Forms Data** means any information you provide to us when you use our contact forms (for example using the "Contact", "Send us a Message" or "Stay in touch" functions on our websites, apps, products or services), the record of that correspondence and other information or personal information you share with us when completing our contact forms in your sole discretion. (Please note that fields marked with an asterisk (*) are mandatory fields, because we need this information to comply with or respond to your request.)
- e) **Marketing Communications Data** means information about how you respond to email, sms, phone and other marketing campaigns.

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 as more particularly detailed in section 2 below.

3. Why do we process your data and how long do we keep it for?

Purposes of the processing	Type of data	Legal basis to process your personal information	Retention period
To manage our relationship with your organization, by establishing or strengthening a business relationship with you.	a) Identity Data b) Professional Data	Legitimate interests in managing our relationship with your organization.	2 years after the end of the business relationship
To respond to your request or questions when you contact us.	a) Identity Data d) Contact Forms Data	Consent	2 years after the last contact
To send you newsletters or information on events that may be of interest to you, that you have signed up for.	a) Identity Data b) Professional Data e) Marketing Communications Data	- Consent - Fulfilment of our legitimate interests to promote our products and services	Until the end of the subscription or the retention period
To send you direct marketing via e-mail when the company that you are working for is our client currently or in the past, or when you opt-in for this purpose in the relevant contact form.	a) Identity Data b) Professional Data e) Marketing Communications Data	- Consent where we are required under the law to obtain consent for marketing - Fulfilment of our legitimate interests to promote our products and services where we are not obliged to obtain consent by law	Until the end of the subscription or the retention period
To identify what companies have interacted with us.	c) Technical Data	Fulfilment of our legitimate interests to administer our websites and/or systems and provide you with relevant information about our products and services	Duration of the session. For the Cookies Data, please refer to our <i>Cookies Policy</i>
To help us create, publish, and improve the most relevant content to you and for your device.	c) Technical Data	Fulfilment of our legitimate interests to administer our websites and/or systems and	Duration of the session. For the Cookies Data, please refer to our <i>Cookies Policy</i>

		provide you with relevant information about our products and services	
To allow you to participate in interactive features of our websites and/or systems, when you choose to do so.	c) Technical Data	Fulfilment of our legitimate interests to administer our websites and/or systems and provide you with relevant information about our products and services	Duration of the session. For the Cookies Data, please refer to our <i>Cookies Policy</i>

4. What marketing communications do we send?

Communications with Businesses

We process your data within the scope of an existing business relationship with you or your company because:

- We have a contract with you (or are considering entering into a contract with you). In this case, the bulk of the personal information 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; or
- It is in our legitimate interests for the conduct of our business activities (for example, to communicate with you in a 'business to business' capacity in order to promote our products and services that we believe will be of interest to you or your company). In that regard, we may also 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; or
- You consented to receive our marketing communications via e-mail as an individual at our clients/companies. In this case, we will send you marketing communications to develop or maintain a business relationship in accordance with applicable electronic and marketing communications laws. These communications 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. If you agree to receive the communications, you must click the box.

How to unsubscribe?

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 'opt-out' function in the email.

In addition, you can also exercise your opt-out right at any time by contacting us at gdpr@adecco.se (please indicate the marketing communications you would like to opt out of receiving in the Request Details field).

5. How do we collect your personal information?

The personal information we collect about you comes from contact forms or other materials you submit to us, your interactions with us and others as part of your business relationship with us. Depending on the relevant circumstances and applicable local laws and requirements, we may collect some of the information listed in Section 2 when you provide us with your business card, talk to us at a conference or other event, or if you are a customer or prospective customer.

In some cases, we will also collect personal information indirectly from third parties, such as Bisnode or from publicly available sources in accordance with applicable law.

6. Do we use artificial intelligence?

Yes, we do use artificial intelligence (AI) at times. However, we do not use your personal information in any automated decision making (a decision made solely by the creation and application of technologies without any human intervention) or profiling (processing of personal information with a range of technologies that produces a legal effect or similarly significant effect concerning you).

We use a range of technologies to analyse your data. In all cases, there is always human intervention in these processes, as we use these tools to support our expert human decision makers.

We use automated systems/processes with the conditions described in the previous paragraph to help our staff navigate in the market and consult you with the best-informed data as possible. We might use AI (for instance machine-learning, logic- or knowledge based and statistical approaches) to provide you, and our applicants as well as associates, with the services you request from us. While we do use AI systems, all decisions which may affect you are taken by our trained recruiters. Accordingly, these AI systems do not have legal effect.

For example, when we are looking for candidates for your open positions, we can leverage historical data as well as actual market data to build a comparison of market relevant information using machine-learning, logic- or knowledge based and statistical approaches which uses attributes like salary data, location, working conditions as well as actual candidate market comparisons to compile a report about the average conditions for your region. With this report our sales consultants can navigate together with you how to attract the staff you need the best possible way.

7. Do we share your data with third parties?

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

- **To our suppliers.** We will, 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 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 candidates in order to process accounts payable and receivable).
- **To members of The Adecco Group and their affiliates (“Members of The Adecco Group”) within or outside the European Union.** A list of the countries in which we operate is available on our website at www.adeccogroup.com/worldwide-locations. Your information will be shared with them for different reasons:
 - information is shared with Members of The Adecco Group that provide IT functions for The Adecco Group companies worldwide; those IT functions are located among others in Czech Republic and France.
 - information is also shared with Members of The Adecco Group worldwide (including the legal entities acquired after the collection of information) for the purposes previously described or to propose offers to you adapted to your profile where you have expressed an interest in local or international opportunities in that market, or Members of The Adecco Group identify that you may have particular skills required or helpful in that market.
- **To government or law enforcement authorities.** We will share your data with government, police, regulators or law enforcement agencies authorities 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.
- **To prospective seller or buyer and their advisors.** 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 advisors.

8. Do we transfer your data outside of your country?

Your personal information can be transferred and processed in one or more other countries, in- or outside the European Union or Switzerland. A full list of the countries in which we operate is available on our website at www.adeccogroup.com/worldwide-locations.

We shall only transfer data to those parties set out in section 7 above who are outside the European Economic Area, UK or Switzerland:

- to countries which the European Commission, the UK Information Commissioner or the Swiss Federal Data Protection and Information Commissioner believes offers an adequate level of protection to you pursuant to Art 45 of the UK and EU GDPR or Art 6 of the Swiss Federal Data Protection Act (Art 16 revised Act) (a list of those countries is available here: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en) and here:

<https://www.edoeb.admin.ch/edoeb/de/home/datenschutz/handel-und-wirtschaft/uebermittlung-ins-ausland.html> (Switzerland), 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, the Information Commissioner's Office (ICO) for the UK or the Swiss Federal Data Protection and Information Commissioner, copies of which are available here: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en; here: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/international-data-transfer-agreement-and-guidance/>) and here:

<https://www.edoeb.admin.ch/edoeb/de/home/datenschutz/handel-und-wirtschaft/uebermittlung-ins-ausland.html> (Switzerland). These are approved by the European Commission, the UK Information Commissioner, the Swiss Federal Data Protection and Information Commissioner under Art 46 of the EU and UK's GDPR and Art 6 of the Swiss Federal Data Protection Act (Art 16 revised Act).

You may request additional information in this respect and obtain a copy of the relevant safeguard by contacting us using the details set out below.

9. What data security measures do we have in place?

We understand how important is to protect your personal information. We have implemented operational procedures and adequate technical and organizational security measures to prevent any unauthorised access, alteration, deletion or transmission of this personal information.

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 our website or any third party; for this reason, any transmission is at your own risk.

10. What are your rights regarding 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 of 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 that we transfer ("port") your personal information direct to another third party provider.
- **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 or to delete 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 information deleted must be granted, we will do so without undue delay.

- **Right to restrict or object to the processing of your personal information**

In certain circumstances you have the right to obtain restriction of the processing of your personal information, or to object to certain processing thereof on grounds relating to your particular situation.

- **Right to withdraw consent**

You have the right to withdraw consent at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you want to exercise any of your rights, please send us an email at gdpr@adecco.se.

Finally, you have the right to lodge a complaint about our processing of your personal information with the data protection authority of the Member State of your regular residence, of your place of work, or of an alleged infringement of your rights (where any of these are relevant to you).

11. How do we handle changes to this Privacy Notice?

The terms of this Privacy Notice 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.

12. Contact

In case you:

- have any questions or concerns regarding this Privacy Notice,
 - would like further information about how we protect your information (for example when we transfer it outside your country), or
 - want to contact The Adecco Group's Data Protection Officer (DPO) or the local Privacy Lead,
- please email The Adecco Group's DPO at globalprivacy@adeccogroup.com or the local Privacy Lead at gdpr@adecco.se

To exercise any of your rights related to your personal information, please send us an email at gdpr@adecco.se.