THE ADECCO GROUP

Adecco AKKODIS LHH

PRIVACY INFORMATION STATEMENT

This Privacy Information Statement applies to all Australian corporations which are members of the Adecco Group of companies. A reference to 'Adecco' in this Privacy Information Statement is a reference to the member corporation of the Adecco Group which is responsible for handling your personal information. We look forward to working with you to help you to further develop your career. As you'd expect, to properly perform our services, we collect and use information about you.

Adecco is committed to protecting and respecting your privacy. This 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 relevant sections if you prefer.

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 Candidate**' or '**You**'.

When we talk about '**us**' or the '**Company**' we mean Adecco. The Company is part of the Adecco Group. 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 candidates/personnel. The Portal allows you to search and apply for jobs the Company and its sister companies advertise which match your interests, skills and/or experience, in the locations where you have expressed an interest in working.

Finally, this is a statement about information and people. It includes facts about you, but also opinions about you and that you hold ("I'm a football fan" for example). 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:

- a username and password (credentials) of your free choice (mandatory fields to take part to the selection process);
- your name, date and place of birth, contact details and qualifications (education, training courses and internships), documents evidencing your identity and right to work and any other information you listed on your resume or CV;

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- if you log on to the Portal using your LinkedIn or any other social media account: your profile data;
- if you contact us, we will keep a record of that correspondence;
- feedback about you from our staff and third parties; where you give feedback on others; in some cases, we will contact your former employer to check your professional experience (this will depend on the job position or certain specific requirements); any reference check will be in accordance with applicable legislation and limited to information which has a direct link to the open job position or the related skills to be assessed;
- your feedback about us and our services through our satisfaction surveys;
- we 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. We may use cookies which are small data files transferred onto computers or devices by websites for record-keeping purposes and to enhance functionality on the website. This information will make your visit to our website/Portal easier in the future. We will, for example, suggest jobs to you which are being handled by branches local to where you were when you contacted us. However most browsers allow you to choose whether to accept cookies or not. If you do not wish to have cookies placed on your computer, please set your browser preferences to reject all cookies before accessing our website/Portal;
- we also collect information for marketing purposes and analysis, including information on how your respond to email, sms, phone and other marketing campaigns. We will have asked you for your explicit consent before sending marketing communication via these means;
- photos and videos of your attendance at a video interview or training or similar sessions (you will be given a chance at the session to ask not to be videoed or photographed);
- details of any disabilities and any accommodations we may need to make for you in the workplace;
- in some cases, we will also collect other sensitive data than only details related to disability, when we are permitted to do so by law. We would like also to inform you that Adecco will perform whatever assessment are necessary as part of the selection process, which may require the data submitted to be processed, and that it will include the results of the assessment in its recruitment database as part of the selection process; and
- you are also informed that, as part of the selection process, the hiring entity may consult details of your public profile on social media (Facebook, Twitter, LinkedIn, etc.), and other public information and records, with the sole purpose of assessing and ascertaining your experience and professional skills, and to know whether your profile is consistent with the Adecco culture and values.

WHY DO WE USE PERSONAL INFORMATION ABOUT YOU?

The Company collects and processes personal information for the following purposes ('**Purpose**'):

1. to provide you with the services you expect us to, like finding you suitable jobs/assignments to apply for, helping you with training, or facilitating the process of applying for jobs/assignments. This includes sending your CV to prospective employers for their consideration and keeping you informed of future work opportunities by email, telephone, mail and/or other communication methods. If you are applying for a position at Akkodis, this also includes the storage of your CV when you upload it on our Portal (including if you do not finalise your application in the Portal (due to technical constraints); in such case your CV will be deleted from our storage system within 24 hours);

2. direct marketing for example via e-mail, messaging or telephone;

3. to further develop, test and improve our website/Portal, or other existing or new systems/processes to better serve you; this takes place in the context of new IT systems and processes, so that information about you will 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;

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4. 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;

5. to transfer data to third parties (see below);

6. where necessary, to comply with any legal obligation; and

7. we will 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. to promote internally that training sessions have taken place and utilise their content (in the case of photos or videos of training sessions), to market similar sessions internally and externally to third parties. In this case we will ask you for an explicit consent; and

   f. 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. If you are applying for a position at Akkodis, this means any interaction where you have actively exchanged with us, i.e. in the following situations:

      - interview has taken place with our recruiters (via phone, video, other)
      - you have made a new application
      - an offer is made to you
      - for temp staffing: end date of the assignment / for perm: start date
      - you sign an employment contract with us.

WHY AND ON WHICH BASIS DO WE USE PERSONAL DATA?

We are required by law to have a ground set out in the law to process the information we hold about you. The legal grounds can be:

1. **Performing a contract or taking steps prior to entering a contract**

When you are already working with or about to engage through Adecco, our processing of personal information for all these purposes is based on processing grounds like the performance of a contract, or about to enter into a contract. These services can be such as providing you with suitable jobs to apply for or helping and assisting you with training and the application process.

2. **Compliance with legal obligations**

Sometimes the processing is necessary to comply with legal or regulatory obligations. Public authorities, such as tax, finance or data protection authorities may request personal data from us, and provide us with a statutory reason to disclose information about you (e.g. the prevention or detection of a crime). In these circumstances, we are forced by law to provide the authorities with your data.

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3. Fulfilment of our legitimate interest

The processing is necessary in the legitimate interests of Adecco in exercising its and its staff's fundamental rights to run a business in a way which does not unduly affect your interests or fundamental rights and freedoms. This means that when processing is necessary for the legitimate interests of Adecco, we balance your interests or fundamental rights and freedoms against our legitimate interest in processing. This ensures that we are not processing data in a manner that your interest and fundamental rights override our interest in such processing.

We shall only process your personal information other than on these grounds with your consent, which is 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 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 may also limit the Services that you can receive from us if you in some instances choose to provide us with limited personal information.

DO WE USE ARTIFICIAL INTELLIGENCE?

As part of our commitment to delivering innovative and efficient solutions, we utilize machine learning and deep learning artificial intelligence (AI) technologies, such as generative AI, in our relationship with Candidates. These technologies enable us to digitize, automate and enhance a wide range of processes associated with staff recruitment. For example, we use AI when our clients are looking for candidates for jobs, we can conduct a search of our lists of candidates which uses attributes such as your job title, availability, skillset, assessment scores and locations, to compile a shortlist which displays a list of candidates that are most likely to fulfil the client's requirement and to quickly determine whether your skills align with the essential requirements of a position.

Third party management

In most cases, we use AI solutions or Large Language Models such as Chat GPT, Gemini and Llama provided by third parties, such as Microsoft, Google or OpenAI. In order to ensure the security, confidentiality, and proper handling of information, we carefully assess such providers prior to their selection, verifying that they comply with applicable legal, ethical and security standards to protect your personal data and fundamental rights. Likewise, we enter into specific contractual clauses regarding liability, aimed at protecting your personal data and data rights and ensuring compliance with current AI, data protection, employment, anti-discrimination and consumer regulations.

Responsibility Commitment

Our Company is committed to responsible use of innovative HR technologies. Read our Responsible AI Principles here. We do not use these technologies as a substitute for people or for human interaction at any stage of our processes. Our use of these technologies is intended to facilitate interactions with our candidates in a manner that is more convenient and efficient.

While we do use AI systems, all decisions that may affect you are made by our trained recruiters. If, in exceptional cases, we were to make such decisions based on a fully automated process (that is, without human involvement), we would only do so where

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permitted by law and after notifying you in advance.

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Security measures

We take measures to prevent bias in the use of these technologies and ensure that all users are treated fairly. For example:

a. Human Oversight: We review the AI systems before, during and after the go-live date to ensure they operate fairly and effectively. Any anomalies or biases identified are promptly addressed to maintain the integrity of our processes.
b. Testing: All AI systems used are subject to regular testing and audits to minimize bias and ensure fairness. We commit to complying with anti-discrimination laws and implementing technical and organizational measures to mitigate risks of unfair treatment or bias.
c. Data & Quality Management: Our data scientists apply consistent data controls and guardrails to ensure that our data sets are clean and consistent from the outset and monitored throughout the lifecycle of our AI systems.
d. Security: We apply state-of-the-art security controls to our data storage and AI systems to prevent unauthorized access to or tampering with our data sets.

In most cases, we will run a three-party model. This means, we will use a large language model (LLM) of a third party and get support from our trusted partner Salesforce to build a safe trust layer between our secured Akkodis network and the third parties LLM. By doing so, we ensure that your personal data remains on our Akkodis instance and does not get shared with any LLM provider.

Here's how it works:

When a prompt (set of instructions) is produced via giving an order or inputting a question and other data to our AI tool, it gets filter via a trust layer before it leaves the Akkodis environment to enter a LLM. In the trust layer, the data gets masked, personal data and data with sensitive content gets detected and removed before it leaves the Akkodis network. It gets replaced through specific placeholders. Only then a prompt is sent to the LLM. The LLM responds and sends the answer back to our trusted partner. It does not store any of the masked data, as it has committed to a **zero retention** period with us and our trusted partner. This means, your personal data is not retained by any LLM we use. Before you receive the answer, the data gets demasked by our trusted partner and only then sent to you.

Will my personal data be used for LLM model training or product improvements by third-party LLMs?

No. Your personal and non-personal data is not used for LLM model training or product

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improvements by third-party LLMs. Also, no data is retained by the third party LLM. It forgets the masked data once it sends the response back to us. Before we send the response back to you, our trusted partner scan the response for toxicity, and the masked data gets demasked. No human being at the third-party provider looks at data sent to their LLM.
The models use three primary sources of information to provide you with a suitable answer: 1) information that is publicly available on the internet (no information that is behind paywalls or registration platforms), (2) information that we partner with third parties to access, and (3) information that our users or trainers provide or generate.

Are we compliant with privacy law by using LLMs?
Yes, as we implement the aforementioned technical measure to keep your personal data safe.

What additional safeguards are in place?
Through our trusted partner we make sure, that harmful data gets scored to improve. The so-called toxicity scores are logged and stored. We also use feedback to improve, and we use dashboards to analyse and to provide a safer and more accurate outcome for you. We check the training data against bias and make sure the chatbot does not discriminate any person for gender, age, ethnicity, religious beliefs, sexual orientation and other privacy right related domains. Also, our processes make sure, that a human is in the centre of our operations and that there is no impactful decision making without human intervention.

HOW LONG DO YOU KEEP MY PERSONAL INFORMATION FOR?

The Company can keep your personal information for up to 7 years after you register with us. If you are successful in finding work through us, the Company will need to keep your personal information for a longer period in order to comply with its on-going legal and contractual obligations. Generally, we retain your personal data concerning taxes, contracts of employment and any financial information (including payroll data and data relating to pay, etc.) for 7 years after your employment ends.

WHICH TERMS APPLY IF YOU SIGN IN WITH LINKEDIN?

We also offer you the opportunity to apply to a given position by using LinkedIn. When you do so, you will be redirected to LinkedIn site ("third party site") which has its own terms about privacy, cookies and use of the platform ("terms"). We suggest you check their terms for more information. We do not accept any responsibility for any third-party website linked to or from the Site. Following any link to any other off-site page or third-party site is at your own risk.

DO WE TRANSFER YOUR DATA TO THIRD PARTIES OR TRANSFER YOUR DATA OUTSIDE OF AUSTRALIA?

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 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;

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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). We 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:** Different members of the group fulfil different functions and as result your information will be shared with them for different reasons:
    - information is shared with members of the Adecco group that provide IT functions, HR functions and other associated administrative support for the Adecco companies world-wide;
    - information is also shared with Adecco affiliates worldwide 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.

Adecco may disclose personal information to overseas recipients in order to provide its services and for administrative or business management purposes. In the event personal information is sent overseas from Australia, Adecco shall adhere to the requirements of the Australian Privacy Principles.

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 have the right to 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. In some limited circumstances, you also have the right to request portability of your personal information, which means, we will provide them to a third party upon your request.

- **Right to correct your personal information**

If personal information we hold about you is not correct, you can request that this information is updated or otherwise corrected. If you are applying for a position at Akkodis, you can also update your information by logging to your account in our Akkodis self-service Portal.

- **Right to restrict**

In certain circumstances, you have the right to restrict the processing of your Personal Data. However, in some instances such restriction of processing may limit the Services that you can

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receive from us.

- **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 privacy@adecco.com.au. When you email us to exercise your rights, the Company will need you to identify yourself before actioning your request.

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.

We will respond to questions or concerns within a reasonable period of time. If you disagree with our decision, you may refer your complaint to the Office of the Australian Information Commissioner by visiting www.oaic.gov.au, calling 1300 363 992 or by emailing enquiries@oaic.gov.au.

WHAT ABOUT DATA SECURITY WHEN USING ADECCO 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 and/or when you want to contact the Company's Privacy Officer, please email us at privacy@adecco.com.au. or mail to Level 4, 123 Pitt Street, Sydney, NSW 2000.

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.

This Privacy Statement is consistent with the Australian Privacy Principles (APPs) as set out in the Privacy Act 1988 (Cth). The APPs can be found at www.oaic.gov.au.

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