

# 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 Regulations (“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), 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 or any particular data protection regulation, 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 systems and processes to be compliant with the 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 that assists with the implementation of our 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.

### Our DPO

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 most recently 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.

Allegis Group is also proud to be an [IAPP Gold Sponsor](#).



# Allegis Group's Data Protection Readiness Program

The Global Privacy Office is actively developing 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, onsite or other forms of auditing



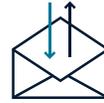
## Training and Awareness and Appointment of Data Protection Officer

- Appointment of Lillian Pang as Data Protection Officer under GDPR
- Online and in-person trainings across the business to promote privacy awareness and teach key privacy principles



## Data Subject Rights

- Implementing a repeatable, scalable process and set of procedures for handling data subject rights requests



## Data Transfers

- Ensuring we are maintaining viable means for transferring personal data; for example, maintaining Privacy Shield certifications and a Global Intra-Group Data Transfer Agreement, based on the model clauses and Article 28 of GDPR, and executing model clauses where needed for the EU and Switzerland



## Data Minimization

- Ensuring that Allegis Group 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 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 Information Systems 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 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 each of our service offerings as explained in the chart below:

	Staffing	Search	Consulting	MSP	RPO
<b>Processor / Service Provider?</b>	Yes	No	Yes	Yes	Yes
<b>What is the Personal Data?</b>	Customer Personal Data – varies (depends on what Customer provides to our Contract Workers)	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
<b>Controller / Business?</b>	Yes	Yes	No	No	Yes
<b>What is the Personal Data?</b>	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.

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# Transferring Personal Data

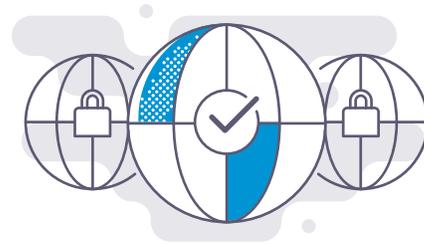
Allegis Group is committed to responsibly and lawfully transferring personal data of our clients while performing our services that involve data subjects from many different countries and regions. In order to do this, Allegis Group has the following mechanisms in place, for example, to handle transfers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



We are EU-US and Swiss-US Privacy Shield certified and have been since the inception of the Privacy Shield Framework. Please see our certification [here](#).

## Model Clauses

We make use of the Model Contract Clauses as appropriate with our business partners.



## 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. While we generally rely on our Privacy Shield certification for transfers from the EEA and Switzerland to the US, the intragroup data transfer agreement provides a second method of transferring that same data while also providing us with a mechanism to allow us to transfer data from the EEA and Switzerland to our companies outside of the US (for instance to our entities located in APAC).



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





ASTON CARTER



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; and Getting Hired.

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