

万宝盛华集团全球隐私政策

生效日期：2018 年 5 月 25 日

万宝盛华集团全球隐私政策声明，针对万宝盛华集团公司以及我们的[子公司和隶属机构](#)（以下统称“数据管理者”）收集到的个人数据。数据管理者收集到的个人数据将会参照本政策进行控制及处理。

这项隐私政策适用于（1）我们的候选人，（2）我们的外包员工，即为客户方提供服务的个人或由我方提供职业规划服务的个人，（3）在此列出的[网页和 APPs](#)（统称“网站”）的用户，以及（4）我方合作伙伴、客户及供应商的代表。这项政策不适用于由我方总部和本土聘用的员工，以及直属万宝盛华但不直接对接客户的员工。

这项政策阐释了我方将收集的个人数据及信息，我们如何使用、分享、加工及保护这些信息，与谁分享向谁转让上述信息，以及对于我们使用其信息，个人所拥有的权力及选择。同时，我们阐明了您如何就隐私条例与我们取得联系并行使您的权力。一般而言，我们的隐私条例符合当地法律法规，包括欧盟地区适用的《通用数据保护条例》（以下简称“GDPR”）。相应地，我们的隐私条例根据各国当地惯例和法律要求可能有所不同，您可以在当地网查看特定国家的信息。

信息收集

我们将通过多种方式来收集您的个人数据，比如通过我们的网站和社交媒体；通过我们举办的活动；通过电话和传真沟通；通过求职申请和现场招聘；通过与客户及供应商的信息交互。根据情况不同，我们可能会收集以下种类的信息（均在当地法律许可之下），包括但不限于：

- 通讯信息（例如：姓名，邮政地址，邮箱地址及电话号码）；
- 登录我们网站的用户名和密码
- 您提供的愿意我们与之接触的朋友或其他联系人信息（信息控制者假设对方已提前授权）
- 其他您可能提供给我们的信息，例如在问卷调查中的反馈或通过网站“联系我们”提交的信息。

除此之外，如果您是一名外包员工或候选人，并且直接申请或注册了一个账号申请职位，我们将收集下列个人数据（均在当地法律许可之下）：

- 工作及教育经历；
- 语言及其他工作相关能力；
- 社保号，身份证号以及其他政府相关认证号；

- 出生日期；
- 性别；
- 银行账户信息；
- 国籍和被授权的工作身份；
- 社保福利信息；
- 税务相关信息；
- 反馈信息；
- 您个人简历包含的信息, 您提供的关于求职方向以及符合相关求职要求的资质信息。

我们也将您在明确同意后收集以下两类个人数据（在法律适用的条件下）：

- 残疾和健康相关的信息；
- 药物测试和犯罪记录调查的结果以及其他背景调查。

除此之外，我们还将收集您提供的其他信息，例如紧急联系人。

我们如何使用收集到的信息

数据管理者将会基于以下目的收集和使用信息（均在当地法律许可之下）：

- a)提供劳务解决方案，以及联系人员参与工作；
- b)创建和管理线上账户；
- c)处理支付问题；
- d)管理我们合作伙伴、客户以及供应商的关系；
- e)在法律允许并于本政策一致的情况下，发送关于合适职位的宣传材料、提醒及其他沟通；
- f)法律允许条件下，沟通、管理特别活动、项目，邀约，问卷调查，相关测试以及市场调查的参与情况；
- g)完成个别调查；
- h)运作、评估、提高我们的业务（包括发展，提高，分析，以及提高我们的服务；管理我们的沟通；完成数据分析；完成会计统计、审计，以及其他内部事务；
- i)防范、鉴别和防止诈骗及其他不法行为、诉讼，以及其他有责行为；

j)遵守并执行法律强制性规定，相关产业标准，合同责任以及我们的相关政策。

所有处理工作将基于充分的若干类法律依据进行，包括：

- a)根据适用法律的要求，需数据主体同意或明确同意；
- b)确保我们符合法定或合约规定，或订立合约所需的规定(例如，处理您的个人数据，以确保正确支付您的工资及税款)；
- c) 针对数据管理者的合法利益而言，如下文更详细的描述是必不可少的(例如，为了提供所需服务而允许访问网站)。

除以上列举的行为之外，如果您是一名外包员工或候选人，申请或开设账户申请岗位，在当地法律许可之下，我们将会把本隐私政策中提到的您的相关信息用于以下用途：

- a)为您提供工作机会；
- b)为您提供 HR 服务，包括福利项目的管理，工资，绩效管理和规划调查及管理；
- c)为您提供额外服务，例如，培训、职业咨询、以及转业服务；
- d)评估您作为候选人与职位的匹配程度或作为员工是否满足相关职位的资质；
- e)处理数据分析，例如 (i) 分析候选人和员工的基本信息；(ii) 评估个人的表现和能力，包括对工作有关技能评分；(iii) 鉴定技能缺点；(iv) 运用相关信息来匹配个人及存在机会；(v) 分析渠道数据（关于雇佣的趋势）。

我们也可能将信息运用于其他方面，在收集信息/时之前，我们将特别关注。

自动化数据管理者使用方法

当您访问我们网站，我们可能会通过自动方式收集特定信息，例如，cookies、web beacons、网页日志等。我们以此方式收集这类信息包括：IP 地址，特定设备号，浏览器特征，设备特征，操作系统，运行语言，URLs，以及在我们网站上的操作信息，访问我们网站的日期和时间，以及其他使用统计。

“**cookie**”是指网站发送给访问者电脑或其他联网设备来识别访问者浏览器、储藏信息或设置的文件。

“**web beacon**”作为一个网络标签，像素标签或 GIF，连接网页到网站服务器和他们的 cookies,通过 web beacon 将收集到的信息从 cookies 反馈回网站服务器。

通过这些自动收集的方法，我们可能获取“点击流数据（clickstream data）”，即用户浏览网站点击的链接和其他内容。

我们的网站使用了如下类型的 cookies

a) 技术型 Cookies (Technical Cookies)

技术型 cookies 用来收集网络交流间的信息传送。对于明确要求的提供者，目前这是必要的举措。

b) 归档型 Cookies (Profiling Cookies)

归档型 cookies 用来创建用户概况，根据用户偏好发送广告。因其对用户隐私具有一定侵略性，当地和欧洲法律要求使用前需经用户同意。

我们如何用自动化渠道收集信息

访问者在访问网站的过程中，其点击行为可能会被收集和储存。我们将关联通过自动方式收集到的特定数据，比如您的浏览器信息，以及其他我们获得的信息关于您的信息，来获知，例如，您是否打开了我们向您的邮箱推送邮件。当您收到某种 cookies 时，您的浏览器将会通知您，或告知您如何限制或不适用某种 cookies。您的浏览器允许您拦截 Cookies，但是，没有 Cookies，您将不能使用我们网站的全部功能。

在我们网站上的第三方 APP，工具，窗口部件，插件的提供方，例如社交媒体分享工具，也将通过自动的方式收集与您与上述工具之间的交互信息。这些信息将直接被这些第三方提供者收集，并遵循第三方的隐私政策。根据法律，万宝盛华集团将不对这些第三方提供者的信息收集行为负责。

在相关法律的要求下，我们在使用 cookies 或其他相似自动功能收集个人信息前将先征得您的同意。

我们如何使用收集到的信息

除此之外，我们将通过 cookies，网站，图片，网站服务器以及其他自动收集的信息运用于

- (i) 定制化网站的用户使用；
- (ii) 向用户进一步推送用户感兴趣的内容；
- (iii) 管理我们的网站以及其他方面业务。

第三方 Cookies

网站也使用第三方分析服务，例如 Google Analytics 和 Adobe Omniture，这些分析提供者运用技术手段提供这些服务，例如通过 cookies、网站服务器等的数据来帮助网站分析用户的使用情况。通过这些手段收集的信息（包括 IP 地址）也将对这些分析服务提供者以及其

他使用信息的相关第三方提供，例如，用以评估网站使用情况。如需了解更多分析服务情况及如何退出，请访问下述网站以及特定国家附录中列出的网站：

- Google Analytics: tools.google.com/dlpage/gaoptout
- Adobe Analytics: adobe.com/privacy/analytics.html#1

定制化和人性化的广告

在我们的网站，我们可能收集您在线上活动的信息，来向您提供您感兴趣的产品和服务的广告。我们也可能以此为目的从提供广告服务的第三方网站获取相关信息

您将在其他网站看到一些特定的广告，因为我们雇佣了第三方网络广告商。通过这些第三方，我们可以通过人数统计，兴趣基础，行为并以连贯方式来向用户传递信息。通过广告网络，通过信息的自动收集，我们可以通过自动的方式收集信息，随时追溯您的线上活动，该自动方式包括通过第三方 cookies、web beacons、网站服务器、图片的使用。网站基于这些信息将向您推送符合您个人兴趣和以往活动的广告。我们可能在广告网络收集的信息包括您访问有万宝盛华广告的网站的数据，例如，您访问的网页或广告信息以及您看到广告后的行动。

这些数据的收集同时在属于广告网络的官网和第三方广告网站进行。这也同时帮助检验我们市场工作是否产生成效。如需了解如何关闭该类兴趣导向的广告服务，请访问 aboutads.info/choices/。在相关法律的要求下，在为启动兴趣导向的广告服务而使用您的信息之前，我们将会取得您的同意。我们的网站的设计不会对浏览器中“不要追踪”的标示做出反应。

我们的网站的设计不会对浏览器中“不要追踪（do not track）”的标示作出反应。

通过网站第三方插件收集的信息（例如您通过社交媒体发出的信息）将直接由第三方插件提供者收集。这些信息遵循第三方提供者的隐私政策，万宝盛华集团不对这些第三方的信息收集行为负责。

第三方网站、APP 和服务的链接

为了您的便利和信息，网站提供了由第三方运营的网站、APP 和服务的链接，这些均不属于万宝盛华集团旗下。这些公司可能拥有自己的隐私政策，我们强烈建议您先进行查看。我们不对不属于万宝盛华旗下的网站、APP 和服务负责。

合法权益

数据管理者可能会为了某些合法的商业目的处理您的个人数据，其中包括以下内容：

- 能够增强、修改、个性化或以其他方式改善我们的服务或通信的部分，以便为我们的客户、候选人和合作伙伴带来利益；

- 识别和防止欺诈行为；
- 加强网络和信息系统的的天全；
- 更好地了解人们如何与我们的网站互动；
- 直接的市场营销用途；
- 向您提供我们认为您会感兴趣的邮件通信；
- 确定促销活动和广告的有效性。

每当我们为这些目的处理数据时，我们都会确保我们高度重视您的权利并考虑这些权利。您有权反对此类处理，并可以通过以下联系方式与我们联系。请注意，如果您行使反对的权利，这可能会影响我们为了您的利益所提供服务的的天全。

我们如何处理和保护个人信息

我们根据上述定义的目的和在特定的时间段内处理我们通过自动方式收集的个人信息，这符合我们的内部保留政策，以确保个人数据的存储时间不会超过必要的天全。

我们维护行政、技术和物理上的安全措施，旨在保护您提供的个人信息免遭意外、非法或未经授权的销毁、丢失、更改、访问、披露或使用。为确保个人资料的天全性和保密性，我们酌情采取以下安全措施：

- 加密传输中的数据；
- 强大的用户认证控制；
- 强化网络基础设施；
- 网络监控解决方案。

我们存储数据的时间有多长

我们将所收集的个人信息存储在我们的系统中，这些数据允许识别的时间将不超过依据上述采集数据目的或进一步处理数据需要的天全。

我们通过考虑以下因素来确定此特定时间段：

- 必须保留收集的个人信息，以提供与用户建立的服务；
- 数据管理员的合法利益，如上述目的所述；

- 存在特定的法律义务，使得处理和相关存储在特定时间段内是必需的。

我们分享的信息

除了在隐私政策中提到或者在特别活动中单独提出的注意事项之外，我们不会公开收集到的关于您的个人信息。我们会把信息分享给代表我们并在我们指示下操作的相关合作企业。除非在涉及相关利益或者法律要求的情况下，我们不会授权这些企业使用或公开这些信息。我们也会将您的个人信息分享给：（1）子公司和隶属机构；（2）如果您是候选人，在符合您条件和兴趣的岗位出现时，我们将会把您的信息分享给客户。（3）其他的同事，例如职业顾问和合作商，为您找到一份工作。

除此之外，我们会在以下情况公开您的信息（1）如果我们基于法律要求公开；（2）法律强制或其他政府机构基于法律的公开要求；（3）当我们认为为防止人身伤害或经济损失公开是必要且合适的，或与参加违法活动嫌疑调查活动相关。在我们产生出售、转移、资产或事务的变动时，我们也将保留转移您个人信息的权利（包括重组、解散、清算）。

数据转移

我们将收集到关于您的信息从原始收集国转移出去。这些国家可能不具备原始收集国相同的数据保护法律。当我们转移您的信息到其他国家时，我们将根据这份隐私政策来保护您的信息，并且此类数据转移将遵守所适用的法律。

所收集的关于您的信息可能被转移至以下国家地区：

- 欧盟内部
- 欧盟外部

当我们个人数据从欧盟内部转移到欧盟之外的国家或国际组织时，转移将会基于：

- a) 欧盟委员会的充分决策
- b) 在没有充分决策的情况下，其他法律上允许的理由：(a) 公共机关或机构之间具有法律约束力，且可执行的法律文件；(b) 应履行的公司规章制度；(c) 委员会颁布的标准数据保护条款（原称为示范条款）。

作为数据主体，您的权利如下：

根据所适用法律授权，数据主体可以行使某些特定权利，例如：

- a) 访问权：数据主体可以访问他或她的个人数据，以验证他或她的个人数据是依法处理的。

b) 纠正权：数据主体可要求纠正有关于他或她的任何不准确或不完整的数据，以保护这些信息的准确性，使之适应数据处理。

c) 删除权：数据主体可以请求数据控制器删除关于他或她的信息，并且不再处理该数据。

d) 处理限制权：数据主体可限制数据管理者对他或她的数据处理。

e) 数据可携权：数据主体可要求数据具有可携性，这意味着数据主体可以以结构化和常用的格式接收原始提供的个人数据，或者数据主体可以要求将数据传送到另一个数据管理者。

f) 客体权利：向数据管理者提供个人数据的数据主体，可以在任何时候，根据 GDPR 阐述中的众多依据来处理数据，且不需要证明他或她的决定是正当的。

g) 不受自动个体决策影响的权利：如果一份数字图表产生了涉及到数据主体的法律效力，或对他或她产生了相似的重大影响，数据主体可要求不受一份自动数据处理下产生的决策所影响。

h) 向监管机构提出申诉权：如果数据主体认为，与他或她相关的个人数据违反了 GDPR，每个数据主体都有权向对应的监管机构提出申诉；特别是在他或她通常居住的欧盟成员国、工作单位或涉嫌侵权的地点。

无论何时，数据处理都要基于数据主体对 GDPR 第 7 条所述的许可，且他或她可随时撤回其许可。

如果您需要更多有关您个人数据处理的信息，请参阅以下“如何联系我们”部分。

给予加州居民的通知

由于特定限制，加州居民可以要求我们提供：（1）之前一年出于第三方直接市场目的，我们向第三方公开的特定类别的个人信息的清单；（2）这些第三方的身份。为了满足这项要求，加州居民可通过“如何联系我们”找到联系我们的方式。

隐私政策的更新

这份全球隐私政策（包括任何附录）会进行实时的修改来反映我们个人信息服务的改变。对于重大改变，我们会通过在政策顶部做出显著标示来提醒您最近更新的政策。

如何联系我们

如果关于隐私政策您有任何问题和建议，您想实现自己的权利或希望我们更新我们现有的您或您偏好的信息。请写信到：



ManpowerGroup Inc.

Attn: General Counsel

100 Manpower Place

Milwaukee, WI 53212

其他方面，如果您居住于欧盟地区，您可以联系您当地的数据保护官，详细信息在您所在当地的官网上隐私条款中有呈现。



Privacy Policy

ManpowerGroup Global Privacy Policy

Effective Date: May 25, 2018

This ManpowerGroup Global Privacy Notice provides a framework of understanding about the personal data that is collected by ManpowerGroup Global Inc. and its subsidiaries and affiliates listed [here](#) (as applicable, hereinafter each separately and/or jointly called the "Data Controller"). Personal data collected by the Data Controller will be controlled and processed in accordance with the terms of this Privacy Notice.

This Privacy Notice applies to (1) our job candidates and recipients of our career services, (2) our associates, who are people we source or place on assignment with one of our clients, or individuals to whom we provide outplacement or career transition services, (3) users of the websites and apps listed [here](#) (the "Sites"), and (4) representatives of our business partners, clients and vendors. This Privacy Notice does not apply to our headquarters and country-based staff employees, who are individuals employed by ManpowerGroup and who work directly for ManpowerGroup and not directly for a ManpowerGroup client.

This Privacy Notice describes the types of personal data or personal information we collect, how we use the information, how we process and protect the information we collect, for how long we store it, with whom we share it, to whom we transfer it and the rights that individuals can exercise regarding our use of their personal data. We also describe how you can contact us about our privacy practices and to exercise your rights. In general, our privacy practices conform with local law and regulation, including where applicable the provisions of the European Union's General Data Protection Regulation (GDPR). Accordingly, our privacy practices may vary among the countries in which we operate to reflect local practices and legal requirements; and you can view specific local terms by visiting our local websites.

Information We Collect

We may collect personal data about you in a variety of ways, such as through our Sites and social media channels; at our events; through phone and fax; through job applications; in connection with in-person recruitment; or in connection with our interactions with clients and vendors. We may collect a selection of personal data dependant on the nature of the relationship, including, but not limited to (as permitted under local law):



ManpowerGroup®

- contact information (such as name, postal address, email address and telephone number);
- username and password when you register on our Sites;
- information you provide about friends or other people you would like us to contact. (The Controller assumes that the other person previously gave an authorization for such communication); and
- other information you may provide to us, such as in surveys or through the "Contact Us" feature on our Sites.

In addition, if you are an associate or job candidate, you apply for a position or create an account to apply for a position, we may collect the following types of personal data (as permitted under local law):

- employment and education history;
- language proficiencies and other work-related skills;
- Social Security number, national identifier or other government-issued identification number;
- date of birth;
- gender;
- bank account information;
- citizenship and work authorization status;
- benefits information;
- tax-related information;
- information provided by references; and
- information contained in your resume or C.V., information you provide regarding your career interests, and other information about your qualifications for employment.

We may also collect the following types of personal data upon receiving your explicit consent (where required by applicable law):

- disabilities and health-related information; and
- results of drug tests, criminal and other background checks.

In addition, we may collect information you provide to us about other individuals, such as information related to emergency contacts.



How We Use the Information We Collect

The Data Controller collects and uses the data gathered for the following purposes (as permitted under local law):

- a) providing workforce solutions and connecting people to work;
- b) creating and managing online accounts;
- c) processing payments;
- d) managing our business partner, client and vendor relationships;
- e) where permitted under law and consistent with this Privacy Notice, to send promotional materials, alerts regarding available positions and other communications;
- f) where permitted under law, for communicating about, and administering participation in, special events, promotions, programs, offers, surveys, contests and market research;
- g) responding to individuals' inquiries and claims;
- h) operating, evaluating and improving our business (including developing, enhancing, analyzing and improving our services; managing our communications; performing data analytics; and performing accounting, auditing and other internal functions);
- i) protecting against, identifying and seeking to prevent fraud and other unlawful activity, claims and other liabilities; and
- j) complying with and enforcing applicable legal requirements, relevant industry standards, contractual obligations and our policies.

All processing will be carried out based on adequate legal grounds which may fall into a number of categories, including:

- a) consent or explicit consent from the data subject, where required by applicable law;
- b) to ensure that we comply with a statutory or contractual requirement, or a requirement necessary to enter into a contract (e.g. processing your personal data to ensure that your wages and taxes are paid correctly); or
- c) it is essential and necessary for the legitimate interest of the Data Controller, as described in more detail below (e.g. allowing access to a website in order to provide the services offered).

In addition to the activities listed above, if you are an associate or job candidate and you apply for a position or create an account to apply for a position, as permitted under local law, we use the information described in this Privacy Notice for the following purposes:

- a) Providing you with job opportunities and work;
- b) providing HR services to you, including administration of benefit programs, payroll, performance management and disciplinary investigations or actions;
- c) providing additional services to you, such as training, career counselling and career transition services;
- d) assessing your suitability as a job candidate and your associate qualifications for positions; and
- e) performing data analytics, such as (i) analyzing our job candidate and associate base;



(ii) assessing individual performance and capabilities, including scoring on work-related skills; (iii) identifying skill shortages; (iv) using information to match individuals and potential opportunities, and (v) analyzing pipeline data (trends regarding hiring practices). We also may use the information in other ways for which we provide specific notice at or prior to the time of collection.

Use of Automated Data Collection Methods

When you visit our Sites, we may collect certain information by automated means, such as cookies, web beacons and web server logs. The information we may collect in this manner includes IP address, unique device identifier, browser characteristics, device characteristics, operating system, language preferences, referring URLs, information on actions taken on our Sites, dates and times of visits to our Sites and other usage statistics.

A "**cookie**" is a file that websites send to a visitor's computer or other Internet-connected device to uniquely identify the visitor's browser or to store information or settings in the browser.

A "**web beacon**" also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies and is used to transmit information collected through cookies back to a web server.

Through these automated collection methods, we may obtain "**clickstream data**," which is a log of the links and other content on which a visitor clicks while browsing a website.

Our Sites use these types of cookies:

a) Technical Cookies

Technical cookies are those used exclusively with a view to "carrying out the transmission of a communication on an electronic communications network, or insofar as this is strictly necessary to the provider of an information society service that has been explicitly requested by the contracting party or user to provide the said service."

b) Profiling Cookies

Profiling cookies are aimed at creating user profiles. They are used to send ads messages in line with the preferences shown by the user during navigation. In light of the highly invasive nature of these cookies, vis-à-vis users' private sphere, local and European legislation requires users to be informed appropriately on their use so as to give their valid consent.



How We Collect Information by Automated Means

As you click through our Sites, a record of the action may be collected and stored. We link certain data elements we have collected through automated means, such as your browser information, with other information we have obtained about you to let us know, for example, whether you have opened an email we sent to you. Your browser may tell you how to be notified when you receive certain types of cookies or how to restrict or disable certain types of cookies. Your browser will allow you to block cookies, however, you may not be able to use all of the features of our Sites without cookies.

Providers of third-party apps, tools, widgets and plug-ins on our Sites, such as social media sharing tools, also may use automated means to collect information regarding your interactions with these features. This information is collected directly by the providers of the features and is subject to the privacy policies or notices of these providers. Subject to applicable law, ManpowerGroup is not responsible for these providers' information practices.

To the extent required by applicable law, we will obtain your consent before collecting information using cookies or similar automated means.

How We Use Information Collected through Automated Means

We use information collected through cookies, web beacons, pixels, web server logs and other automated means for purposes such as

- (i) customizing our users' use of our Sites;
- (ii) delivering content tailored to our users' interests and the manner in which our users use our Sites; and
- (iii) managing our Sites and other aspects of our business.

Third-Party Cookies

We also use third-party analytics services on our Sites, such as those of Google Analytics and Adobe Omniture. The analytics providers that administer these services use technologies such as cookies, web server logs and web beacons to help us analyze your use of our Sites. The information collected through these means (including IP address) may be disclosed to these analytics providers and other relevant third parties who use the information, for example, to evaluate use of the Sites. To learn more about these analytics services and how to opt out, please visit the following sites and any sites contained in the country-specific addenda:



- Google Analytics: tools.google.com/dlpage/gaoptout
- Adobe Analytics: adobe.com/privacy/analytics.html#1

Profiling and Interest-Based Advertising

On our Sites, we may collect information about your online activities to provide you with advertising about products and services tailored to your individual interests. We also may obtain information for this purpose from third-party websites on which our ads are served.

You may see certain ManpowerGroup ads on other websites because we engage third-party advertising networks. Through such advertising networks, we can target our messaging to users through demographic, interest-based, behavioural and contextual means. Through the ad networks, we can track your online activities over time by collecting information through automated means, including through the use of third-party cookies, web server logs, pixels and web beacons. The networks use this information to show you advertisements that may be tailored to your individual interests and previous activity. The information our advertising networks may collect on our behalf includes data about your visits to websites that serve ManpowerGroup advertisements, such as the pages or advertisements you view and the actions you take on the websites. This data collection takes place both on our Sites and on third-party websites that participate in these ad networks. This process also helps us track the effectiveness of our marketing efforts. To learn how to opt out of this ad network interest-based advertising, please visit aboutads.info/choices/. To the extent required by applicable law, we will obtain your consent before using your information for interest-based advertising.

Our Sites are not designed to respond to "do not track" signals from browsers.

Information collected through third-party plug-ins and widgets on the Sites (such as information relating to your use of a social media sharing tool) is collected directly by the providers of the plug-ins and widgets. This information is subject to the privacy policies of the providers of the plug-ins and widgets, and ManpowerGroup is not responsible for those providers' information practices.



Links to Third-Party Sites, Apps and Services

For your convenience and information, our Sites may provide links to third-party sites, apps and services that may be operated by companies not affiliated with ManpowerGroup. These companies may have their own privacy notices or policies, which we strongly suggest you review. We are not responsible for the privacy practices of any non-ManpowerGroup sites, apps or services.

Legitimate Interest

The Data Controller may process personal data for certain legitimate business purposes, which includes some of all of the following:

- where the process enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of our clients, candidates and associates;
- to identify and prevent fraud;
- to enhance security of our network and information systems;
- to better understand how people interact with our websites;
- for direct marketing purposes;
- to provide postal communications to you which we think will be of interest to you; and
- to determine the effectiveness of promotional campaigns and advertising.

Whenever we process data for these purposes we will ensure that we keep your rights in high regard and take account of these rights. You have the right to object to such processing, and may do so by contacting us as described below. Please bear in mind that if you exercise your right to object, this may affect our ability to carry out and deliver services to you for your benefit.

How We Process and Protect Personal Information

We process the personal data we collect, also by automated means, for the purposes defined above and for a specific period of time, which complies with our internal retention policy, in order to ensure that the personal data are not kept longer than necessary.

We maintain administrative, technical and physical safeguards designed to protect the personal data you provide against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. In order to ensure adequate security and confidentiality of the personal data, we may apply the following security measures as appropriate:

- Encryption of data in transit;



- Strong user authentication controls;
- Hardened network infrastructure; and
- Network monitoring solutions.

How Long We Store Data We Collect

We store in our systems the personal data we collect in a way that allows the identification of the data subjects for no longer than it is necessary in light of the purposes for which the data was collected, or for which that data is further processed.

We determine this specific period of time by taking into account:

- The necessity to retain the personal data collected, in order to offer services established with the user;
- The legitimate interest of the Data Controller, as described in the purposes above; and
- The existence of specific legal obligations that make the processing and related storage necessary for specific period of times.

Information We Share

We do not disclose personal data that we collect about you, except as described in this Privacy Notice or in separate notices provided in connection with particular activities. We may share personal data with vendors who perform services on our behalf based on our instructions. We do not authorize these vendors to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements. We also may share your personal data (i) with our subsidiaries and affiliates; (ii) if you are a job candidate, with clients who may have job opportunities available or interest in placing our job candidates; and (iii) with others with whom we work, such as job placement consultants and subcontractors, to find you a job.

In addition, we may disclose personal data about you (i) if we are required to do so by law or legal process; (ii) to law enforcement authorities or other government officials based on a lawful disclosure request; and (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity. We also reserve the right to transfer personal data



we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, dissolution or liquidation).

Data Transfers

We also may transfer the personal data we collect about you to countries outside of the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the personal data. When we transfer your information to other countries, we will protect that data as described in this Privacy Notice and such transfers will be in compliance with applicable law.

The countries to which we may transfer the personal data we collect about you may be:

- Within the European Union
- Outside the European Union

When we transfer personal data from within the European Union to countries or international organizations that are based outside the European Union the transfer takes place on the basis of:-

- a) An adequacy decision by the European Commission; or
- b) In the absence of an adequacy decision, other legally permitted grounds: (a) a legally binding and enforceable instrument between public authorities or bodies; (b) binding corporate rules; or (c) standard data protection clauses (formerly called the Model Clauses) promulgated by the Commission.

Your Rights as a Data Subject

When authorized by applicable law, a data subject may exercise certain specific rights, such as:

- a) Right of access: A data subject may access his or her personal data in order to verify that his or her personal data is processed in accordance with law.
- b) Right to rectification: A data subject may request the rectification of any inaccurate or incomplete data held about him or her, in order to protect the accuracy of such information and to adapt it to the data processing.



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- c) Right to erasure: A data subject may request that the Data Controller erases information about him or her and to no longer process that data
- d) Right to restriction of processing: A data subject may request that the Data Controller restricts the processing of his or her data.
- e) Right to data portability: A data subject may request data portability, meaning that the data subject can receive the originally provided personal data in a structured and commonly used format or that the data subject can request the transfer of the data to another data controller.
- f) Right to object: A data subject who provide a Data Controller with personal data may object, at any time, to the data processing on a number of grounds as set out under GDPR without needing to justify his or her decision.
- g) Right not to be subject of automated individual decision-making: A data subject may request not to be subject to a decision based solely on automated processing, including profiling, if such profiling produces a legal effect concerning the data subject or similarly significantly affects him or her.
- h) Right to lodge a complaint with a supervisory authority: Every data subject has the right to lodge a complaint with an applicable supervisory authority; in particular in the EU Member State of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes GDPR.

Whenever data processing is based on consent as described under Article 7 of the GDPR, the data subject may withdraw his or her consent at any time.

If you require more information about the processing of your personal data, please refer to the How to Contact Us section below.

Notice to California Residents

Subject to certain limitations, California residents may ask us to provide them with (i) a list of certain categories of personal information that we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year, and (ii) the identity of those third parties. To make this request, California residents may contact us as specified in the "How to Contact Us" section below.

Updates to Our Privacy Notice

This Privacy Notice (including any addenda) may be updated periodically to reflect changes in our privacy practices and legal updates. For significant changes, we will notify you by posting a prominent notice on our Sites indicating at the top of each notice when it was most recently updated.

How to Contact Us



If you have any questions or comments about this Privacy Notice, or if you would like to exercise your rights, please write to:

ManpowerGroup Global Inc.
Attn: General Counsel's Office
100 Manpower Place
Milwaukee, WI 53212

Alternatively, if you are located in the European Union, you may contact your local Data Protection Officer, as identified in the Privacy Notice on your local website.