

## Privacy Statement

**Kelly Services, Inc.** and its subsidiaries ("**Kelly Services**" or "**Kelly**") respects your privacy and we acknowledge that you have certain rights related to any personal information we collect from you and we have certain obligations in respect of the same. Kelly Services supports the various international and local privacy laws, and has procedures in place to meet the requirements of those laws.

This Privacy Statement supports our privacy principles and informs you about our practices for gathering, storing, and using the personal information of individuals who use our websites, apply for or use our employment or outsourcing services, and those who are representatives of our customers (including prospective customers), service providers, and suppliers.

We encourage you to review this information so that you may understand how we collect, use, and share your personal information.

This privacy statement also covers our group of companies. Each group company is a data controller, and company names and information can be found at this link: [Kelly Services, Inc. Company Names and Information](#).

Those group companies listed above who are not located in Europe can also be contacted through their representative: Kelly Services (UK) Limited, 17 Union Street, Kingston-upon-Thames, Surrey KT1 RR, +44(0)20 8481 1200, Registration Number Z9253237.

If we change anything important about this statement (the information we collect, how we use it, or why we use it) we will highlight those changes in the Change History section at the end of this Privacy Statement and provide a prominent link to it for a reasonable length of time following the change and prior to the change taking effect.

If you have questions, please contact the Data Protection Officer at:

**E-mail:** [privacy@kellyservices.com](mailto:privacy@kellyservices.com)

**Post:** Kelly Services, Inc. in the U.S. can be contacted at 999 W. Big Beaver Road Troy, MI 48084.

Kelly Services, Inc., in Europe can be contacted through its subsidiary, Kelly Services Management Sàrl at Av. Edouard-Dubois 20, PO Box 48, 2006 Neuchâtel, Switzerland.

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## Information We Collect

Kelly collects, stores, and uses personal data to provide our recruiting, employment, outsourcing, and consulting services. We collect personal data about individuals who use our websites, apply for employment or engagement with us, or placement by us through our recruitment services, and those who are representatives of our customers (including prospective customers).

Most of this data is provided by you directly when you contact us, submit an application, attend an in-person recruiting event, through phone conversations, contact us about our services, or during your outsourcing or employment relationship.

We also collect data about individuals who are employed or engaged by our customers in connection with our provision of outsourcing and consulting services to those customers. This is generally obtained through our interactions with customers, suppliers, and service providers.

When you interact with a Kelly website or application, we collect data related to how you interact with that service by, for example, our use of cookies placed on your device.

We have set out further details below on the types of personal data we collect, store, and use and the reasons we use your personal data.

	What personal data we collect	The reason we use your personal data
1	<p>Information you provide to us as part of the registration process and our relationship with you when you engage us to provide recruitment or job-matching services whether provided online, in-person, or by telephone, including:</p> <ul style="list-style-type: none"> <li>• <b>Name and contact information</b> – including: postal address, e-mail address, telephone number, and other similar contact data.</li> <li>• <b>Education, work history, and qualifications</b> – including your education history, employment history, work-related skills and experience, professional credentials or licenses, membership in professional organizations, career interests, preferences, qualifications, information provided by references, and other information provided on</li> </ul>	<p>We use this personal data:</p> <ul style="list-style-type: none"> <li>• to create, manage, and administer the individual's relationship with us;</li> <li>• to assess an individual's suitability for employment and employ individuals;</li> <li>• to match candidates with potential positions;</li> <li>• to offer candidates placement at our customers;</li> <li>• to refer an individual for employment to one of our customers;</li> <li>• to provide general work-seeking services to individuals;</li> <li>• to meet our obligations when acting as an employer in connection with the contract of employment and other obligations which apply to us under applicable employment laws;</li> <li>• to manage the employment relationship with an individual, including for human resources management (for example career development, training, talent management, performance management, appraisals, and disciplinary and grievance management);</li> <li>• to detect or prevent any inappropriate behavior or breach of our policies, including protecting our intellectual property, confidential information, and assets;</li> <li>• for making contact in an emergency;</li> </ul>

	<p>your résumé or Curriculum Vitae (CV).</p> <ul style="list-style-type: none"> <li>• <b>Demographic data</b> – including your date of birth, citizenship and work authorization status, and contents of any other identification provided to Kelly for application or employment purposes.</li> <li>• <b>Identification data</b> – including your employee identification or social security number and/or driver’s license, passport, or State ID number and contents.</li> <li>• <b>Job-related social media data</b> – including collecting your information from and related to publicly published profiles you’ve created on job-related social media platforms and job boards (such as LinkedIn, Monster, or Indeed)</li> <li>• <b>Performance and Employment data</b> – including information contained in your personnel file with Kelly, performance reviews, assessments, and disciplinary action.</li> </ul>	<ul style="list-style-type: none"> <li>• for ensuring that our (or any of our group companies) systems are used primarily for business purposes, have sufficient capacity for the needs of the business, and are protected against cybersecurity threats such as malware;</li> <li>• to meet our obligations to an individual in respect of our contract with the individual when we act as an employment agency, recruiter, hirer, or outsourcing or consulting agency;</li> <li>• to contact individuals via regular mail, e-mail, phone, text messages, and online communication platforms about our company or job openings that match the individual's stated preferences, qualifications, and/or profile; these communications will only come directly from Kelly Services (or agents working on behalf of Kelly). At all times, individuals may opt out of receiving these communications; for details see the Your Rights and Choices section below);</li> <li>• for the purposes of any potential and/ or actual litigation or investigations concerning us or any group company or its officers; and</li> <li>• to personalize and deliver content about our services to individuals. For example, where individuals share geolocation data with us, this will allow the individual to search for jobs or create job alerts within that geographic area.</li> </ul>
2	<p>Information that we receive from our customers and other third parties about their employees and other personnel that we require for the purposes of providing staffing consultancy and outsourcing services including:</p> <ul style="list-style-type: none"> <li>• <b>Name and contact information</b> – including: postal address, e-mail</li> </ul>	<p>We use this personal data:</p> <ul style="list-style-type: none"> <li>• to provide staffing consultancy, outsourcing, and vendor management services;</li> <li>• for staff administration and operational purposes (for example, in relation to absences, pay, benefits, compensation, stock administration, business travel, maintaining employee directories, enabling access to our systems and resources, managing authorization controls, ensuring the security of our systems and resources, management forecasts, and planning changes in our group structure);</li> </ul>

	<p>address, telephone number, and other similar contact data.</p> <ul style="list-style-type: none"> <li>• <b>Education, work history, and qualifications</b> – including your education history, employment history, work-related skills and experience, professional credentials or licenses, membership in professional organizations, career interests, preferences, qualifications, information provided by references, and other information provided on your résumé or Curriculum Vitae (CV).</li> <li>• <b>Demographic data</b> – including your date of birth, citizenship and work authorization status, and contents of any other identification provided to Kelly for application or employment purposes.</li> <li>• <b>Identification data</b> – including your employee identification or social security number and/or driver’s license, passport, or State ID number and contents.</li> <li>• <b>Performance and Employment data</b> – including information contained in your personnel file with Kelly, performance reviews, assessments, and disciplinary action.</li> </ul>	<ul style="list-style-type: none"> <li>• to manage the employment or outsourcing relationship, such as responding to inquiries, providing human resource services, processing and administering payments and payroll, administering benefits, providing counseling, training, or discipline, complying with health, safety, and internal policies, corporate management, career and performance monitoring, and employment contract administration</li> <li>• to provide, improve, or develop services we provide to our customers, suppliers, or service providers or to perform essential business operations. This includes performing data analysis, research, and studies to assess the candidate, employee, and contractor population for staffing and outsourcing services. This also includes analyzing trends in hiring and placement opportunities, evaluating workforce trends related to requested and available skills and experience, researching, implementing, and marketing business opportunities, analyzing employee distribution, succession planning, and corporate organization. These tasks are necessary to recruit, match, and present potential placement opportunities for individuals in our staffing and outsourcing programs;</li> <li>• to detect or prevent any inappropriate behavior or breach of our policies including protecting our intellectual property, confidential information, and assets;</li> <li>• for ensuring that our (or any of our group companies) systems are used primarily for business purposes, have sufficient capacity for the needs of the business, are protected against cybersecurity threats such as malware; and</li> <li>• for the purposes of any potential and/ or actual litigation or investigations concerning us or any group company or its officers.</li> </ul>
3	<p>Information collected about you which falls within "special categories of personal data" including:</p>	<p>We use this personal data as outlined below:</p> <ul style="list-style-type: none"> <li>• In some jurisdictions, we must process this personal data in order to comply with statutes, rules, and regulations pertaining to equal employment opportunities or to assist Kelly Services in</li> </ul>

	<ul style="list-style-type: none"> <li>• <b>Screening data</b> – including drug, alcohol, and criminal background checks.</li> <li>• <b>Financial and benefits data</b> – including your national or tax identification number, social security number, financial or bank account information, tax-related information, next-of-kin or emergency contact information, benefits selections potentially including health insurance, retirement planning information, and disability and health-related information, and health information, including that related to a work-related claim (e.g. Workers’ Compensation Claim).</li> <li>• <b>Information relating to leaves of absence</b> - including sickness absence or family related leaves.</li> <li>• <b>Information about your physical or mental health, condition, or disability status.</b></li> <li>• <b>Additional demographic information</b> – including, your gender, race, ethnicity, disability, veteran information, ideological views or activities, or membership in trade unions.</li> <li>• <b>Biometric Data</b> – including utilizing fingerprint identification.</li> </ul>	<p>compiling data for its equal opportunities practices and reporting, we may also ask you to provide additional information. The provision of this type of information will be voluntary, unless it is required by law, and failure to provide this information will not hinder your employment or project opportunities.</p> <ul style="list-style-type: none"> <li>• We collect and use Screening Data when consistent with a legal basis and only as authorized under applicable law.</li> <li>• We collect and use financial and benefits data to administer payments to you, provide employment-related health and retirement services, and other benefits applicable to your employment.</li> <li>• We collect and use biometric data in order to limit access to certain secure locations.</li> <li>• We use information relating to leaves of absence to comply with employment, social security, social protection and other laws, and to record and administer sickness and maternity leave.</li> <li>• We use information about your physical or mental health to ensure your health and safety in the workplace and to assess your fitness to work subject to appropriate confidentiality safeguards and to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.</li> </ul>
4	Information that we collect from <b>individuals</b>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• provide and manage staffing placement, consultancy, outsourcing, and vendor management services;</li> </ul>

	<p><b>representing organizations</b>, including:</p> <ul style="list-style-type: none"> <li>• contact details of individuals working for our customers, service providers, and suppliers.</li> <li>• contact details of individuals who attend our sponsored events, conferences, and webinars.</li> <li>• other personal information regarding such individuals.</li> </ul>	<ul style="list-style-type: none"> <li>• develop and maintain staffing and outsourcing relationships with our customers, suppliers, and service providers. We use the information, including delivering event and marketing communications, through e-mail, telephone, text messaging, direct mail, and online communication platforms. These notifications will provide instructions on how to opt out of receiving similar e-mails or communications from the service; and</li> <li>• improve our services and develop new services based on the preferences and behaviors of these individuals.</li> </ul>
5	<p>Information we collect through your use of our website, including:</p> <ul style="list-style-type: none"> <li>• <b>Website data</b> – We collect User ID, log-in credentials, password, and/or PIN.</li> <li>• <b>Location data</b> – We collect data about your location, such as Global Navigation Satellite System (GNSS) data (e.g., GPS), data identifying nearby cellular towers and Wi-Fi hotspots.</li> <li>• <b>Cookies and similar data</b> – As further described in our Cookie Policy, we use cookies, web beacons, and other similar technologies to recognize and personalize your online experience with Kelly.</li> </ul>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• identify issues with the website or application and user's experience of the website or application;</li> <li>• manage and administer our IT systems; and</li> <li>• monitor the way our website is used (including locations it is accessed from, devices it is accessed from, understanding peak usage times, and analyzing what functionality and information is most and least accessed).</li> </ul> <p>Instead of having to type in your personal information, some of functionalities on our website may allow you to use third-party authentication tools such as Facebook, Twitter, and Google to populate certain fields. By authenticating through one of the social media options, you allow us to receive your personal and other information that is accessible through these tools. This information may be incorporated into your profile. For any such tool you choose to use, we encourage you to also review the tool provider's privacy policy and any terms and conditions.</p>
6	<p>Information when <b>you communicate with us</b> whether in person, through our website or via e-mail, over the phone, through</p>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• answer any issues or concerns;</li> </ul>

	<p>social media, or via any other medium, including:</p> <ul style="list-style-type: none"> <li>• your contact details (which can include your e-mail address or social media account details, depending on how you choose to communicate with us)</li> <li>• the details of your communications with us (including when you sent it, when we received it and where you sent it from (such as our website, post, telephone, e-mail, or social media))</li> <li>• the details of our messages to you (including information that you may post on our social media platforms)</li> </ul>	<ul style="list-style-type: none"> <li>• monitor communications for quality and training purposes;</li> <li>• develop new services which is based on the information you provide;</li> <li>• improve our services based on the information and feedback you provide and the information and feedback provided by others;</li> <li>• personalize our service to you to take account of the information and feedback you have provided; and</li> <li>• make necessary disclosures in response requests which we are legally required to comply with, to law enforcement or regulatory authority, body or agency, or in the defense of legal claims.</li> </ul> <p>We may use personal information to permit you to participate in live social media feeds. If you choose to participate, your public username may be displayed on the sites along with your post, including, but not limited to, comments, images, and video. We may provide you with access to third-party functionality that allows you to post content to your social media account(s). Any information that you provide through use of this functionality is governed by the applicable third party's privacy policy, and not by this Privacy Statement.</p>
7	<p>Information <b>that we collect from third party partners, our customers, and other Kelly companies</b> which includes:</p> <ul style="list-style-type: none"> <li>• Credit reference agencies</li> <li>• Background screening companies</li> <li>• Identity verification companies</li> <li>• Other entities in our group</li> </ul>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• ensure that individual are genuine and to verify the information provided to guard against fraud and other criminal activities;</li> <li>• provide, manage, and administer our services to individuals and our customers;</li> <li>• manage and administer our IT systems;</li> <li>• personalize our service to you by complementing your behaviors and preferences;</li> <li>• perform statistical analysis and research into the individuals using our services so that we can better understand our users and develop and improve our services to meet the needs and preferences of our users and our customers; and</li> <li>• combine this information with other types of information mentioned above to create holistic profiles of our customers</li> </ul>

		which allows us to make our services more personal and tailored to each customer's preferences and habits.
8	<p>Information that we collect incidentally from <b>other sources or public sources</b>, including:</p> <ul style="list-style-type: none"> <li>• information available in the media;</li> <li>• information presented on our social media or wider social media platforms including Facebook, Twitter, and LinkedIn;</li> <li>• information collected by security systems</li> </ul>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• maintain market awareness;</li> <li>• build and maintain social media presence and branding; and</li> <li>• provide security to our premises.</li> </ul>

## Why We Use Your Information

We will use your personal data where:

- you have given your consent to the relevant processing activity for the purposes of which we have informed you. Where this is the case, you always have the right to withdraw that consent;
- it is necessary for the performance of and compliance with your employment contract or other applicable engagement contract with us or in order to take steps prior to entering into that contract or another contract with you;
- we need to process your information in order to comply with a legal or regulatory obligation (for example, complying with duties under employment, social security, social protection, and tax legislation for example, complying with our obligations under equality legislation or in relation to statutory sickness or maternity rights);
- exceptionally it is necessary for vital interests relating to you or another person (for example, avoiding serious risk of harm to you or others); or
- it is necessary for our legitimate interests (or those of a third party) provided that our legitimate interests are not overridden by your interests or rights which require protection of your data.

We will use special categories of personal data where:



- you have provided your explicit consent. Where this is the case, you always have the right to withdraw that consent;
- we need to do so to carry out our legal obligations (e.g. in the context of employment, social security and social protection law, or for a collective agreement) for example, complying with our obligations under equality legislation or in relation to statutory sickness or maternity rights;
- it is necessary for the establishment, exercise, or defense of legal claims;
- it is necessary for the purposes of preventative or occupational medicine, for the assessment of your working capacity, medical diagnosis, or provision of health care (for example, in relation to Occupational Health referrals and reports);
- where it is needed for reasons of substantial public interest, such as for equal opportunities monitoring;
- exceptionally, where it is necessary for vital interests relating to you or another person (for example, avoiding serious risk of harm to you or others) and where you are not capable of giving consent; or
- where you have already made the relevant personal information public.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

### **Legitimate Interests**

As mentioned above, we can, sometimes, use your personal information where this is necessary for our legitimate interests (or those of a third party). This includes where use of your personal information is necessary to:

- ensure effective administration and management of your employment or engagement, benefits, management of the business, and business continuity;
- ensure our assets are protected, kept confidential, and not used for inappropriate or unlawful purposes;
- prevent, detect, or investigate unauthorized use of our systems and ensure we comply with law and our policies;
- ensure we can contact you or your family in the case of an emergency;
- check you are legally entitled to work, manage performance, discipline, and promotion processes;

- manage training and development requirements;
- maintain product development and enhancement, along with effective marketing through analytics and profiling for business intelligence;
- deal with disputes and accidents and take legal or other professional advice;
- comply with another country's laws and regulations;
- prevent fraud and financial crime; and
- ensure network and information security.

If you would like further information on our legitimate interests as applied to your personal information, please contact the Data Protection Officer.

**Failure to provide information where required**

Where we are requesting information from you in order to employ or engage you, or in order to place or job-match you, if you do not provide the information that we have identified as required we may be unable to properly assist with your request for employment, placement, or job-matching to be performed by Kelly Services.

**Retaining Your Information**

We will retain your personal information for as long as is necessary in connection with our agreement with you, to provide you with the services requested, or for other necessary purposes such as compliance with a law, regulation, or other legal authority, or as is otherwise permitted to be maintained for other legal purposes, such as audit, security, fraud prevention, or preserving and defending Kelly's legal rights.

Due to our various obligations for retaining records, retention periods may vary. For example, we will retain a copy of your contact details if you object or opt-out of receiving direct marketing communications from us. We will add your details to our suppression list to ensure you do not receive any future marketing communications from us. Also, we will not delete personal data if relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved.

We use the following criteria to determine retention periods:

- how long the data is needed to provide staffing and outsourcing services and operate our business;
- whether there are contractual or legal obligations that exist that require us to retain the data for period of time;
- whether any law, statute, or regulation allows for a specific retention period;

- whether an individual has agreed to a longer retention period;
- whether the data is considered to be sensitive data, in which case a shorter retention period generally would be applied; and
- what the expectation for retention was at the time the data was provided to us.

In all cases, we will continue to protect your personal data in accordance with the terms of this Privacy Statement. We will also routinely refresh our information to ensure we keep it up-to-date.

## Where Your Information May Be Shared

Kelly Services holds its employees, agents, and suppliers accountable for maintaining the trust that you place in us with your personal information.

For individuals, Kelly shares the data that is necessary to perform its staffing and outsourcing services with other Kelly Services entities, customers, suppliers, or with service providers that may be engaged to assist in managing the processes required to provide these services.

Any engagement of a customer, supplier, or service provider will be governed by appropriate contractual requirements prohibiting the use of your information for any purposes beyond those specifically directed by Kelly, and requiring that they ensure sufficient administrative and technical security mechanisms are in place to prevent your information from being improperly used, disclosed, or accessed.

In order to provide you the employment and outsourcing services requested by you, or in order to provide our staffing, outsourcing, and consultancy services, we share your personal data with:

- our customers or suppliers for potential placement, employment, or outsourcing opportunities;
- our customers or suppliers who are seeking employees that match your qualifications and profile; and
- the company to which you have been assigned to work, in order to integrate with their application and employment processes.
- Managed Service Providers that administer and manage contingent workforce programs for our customers.
- Service providers that perform outsourced administrative services on our behalf, such as applicant tracking systems, human resource information management, payroll processors, and benefit administrators.
- Our information technology vendors for data storage or hosting, business continuity, and disaster relief.

At all times, Kelly shares your personal data with these third parties only for recruitment, placement, employment, and outsourcing purposes.

We also share your information with certain other third parties. We will do this either when we receive your consent or because we need them to see your information to provide services to you or for one of the other purposes set out in this Privacy Statement. These include tax authorities, credit reference agencies, anti-fraud databases and agencies, and screening agencies.

As a result of the global scope of Kelly's operations, the sharing of your information with other Kelly Services entities, service providers, suppliers, and customers may result in your data being sent to countries outside of your country of residence, which may have data protection laws that differ from those in your country of residence. The areas in which recipients are located will vary based on the nature of the services, but may include the United States, Mexico, Brazil, Canada, Europe, Middle East, Africa, Asia, and Australia. Regardless of the source or destination location of your information, Kelly will at all times protect your information as described in this Privacy Statement, and abide by all applicable data protection laws. Kelly remains responsible for information that we share with third parties for processing on our behalf.

Your personal data may be transferred to other third party organizations in certain scenarios:

- If we discuss selling or transferring part or all of our business – the information may be transferred to prospective purchasers under suitable terms as to confidentiality;
- If we are reorganized or sold, information may be transferred to a buyer who can continue to provide services to you;
- If we're required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority – for example the Police; or
- If we are defending a legal claim your information may be transferred as required in connection with defending such claim.

#### **European Economic Area and Switzerland**

For individuals located in the European Economic Area ("EEA") or Switzerland, when transfers to third parties outside of the EEA or Switzerland occur, Kelly will put sufficient protections in place to ensure compliance with the applicable legal requirements, such as use of European Union ("EU") Model Contracts, or for U.S.-based entities, language requiring adherence to the EU-U.S. Privacy Shield or such other protocols as may be in place from time to time. If you would like further information about our use of Model Contracts, please contact the Data Protection Officer at [privacy@kellyservices.com](mailto:privacy@kellyservices.com).

Finally, your information may be shared with relevant government entities if Kelly is required to do so by law or legal process, or is lawfully requested to do so by law enforcement authorities or other government officials or other regulatory authority, body, or agency.

## Privacy Shield

In order to ensure transfers of personal information from the European Economic Area (EEA) or Switzerland to the U.S. are done so in a secure and compliant manner, Kelly is a participant in the EU-U.S. Privacy Shield program and the Swiss-U.S. Privacy Shield Framework and its principles (Collectively

“Privacy Shield”). If there is any conflict between the terms in this policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern.

As a participant in these programs, Kelly certifies annually its continued commitment to uphold the Privacy Shield Principles for all data received from the EEA or Switzerland in reliance on the Privacy Shield, and to be subject to the investigatory and enforcement powers of the United States Federal Trade Commission (FTC). To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

Kelly provides individuals with the ability to resolve complaints or make inquiries directly with the company by contacting [privacy@kellyservices.com](mailto:privacy@kellyservices.com) or through other methods outlined in the section titled How to Contact Kelly.

For any disputes which cannot be directly resolved with the company, Kelly Services agrees to provide access to an independent dispute resolution body designed to address the privacy-related complaints of EEA or Swiss data subjects free of charge.

For inquiries or complaints related to Human Resources Data, Kelly Services will cooperate with EU Data Protection Authorities and the Swiss Federal Data Protection and Information Commissioner (collectively, “Data Protection Authority”) in the investigation and resolution of complaints brought under the Privacy Shield, including complying with advice given by Data Protection Authorities (as described in the Privacy Shield Principles). Individuals may contact their Data Protection Authority directly to resolve disputes.

For inquiries or complaints not related to Human Resources Data, Kelly has established an independent recourse mechanism, the International Centre for Dispute Resolution, the international division of the American Arbitration Association (“ICDR/AAA”). The ICDR/AAA can be contacted for resolution of the issue by visiting <http://go.adr.org/privacyshield.html>.

As further explained in the Privacy Shield Principles, a binding arbitration option will also be made available to you in order to address residual complaints not resolved by any other means.

For individuals located in the European Economic Area (“EEA”) or Switzerland more information is provided in the “Your Rights and Choices” section.

## Your Rights and Choices

We respect your right to access and control your information. The amount of personal information you are required to supply when requesting our services is consistent with Kelly’s interests in providing our services to you. Kelly complies with applicable data protection laws and regulations.

We process personal data about you for the purposes set out in this Privacy Statement, including to provide recruitment, placement, employment or outsourcing services, operate our business, comply with our legal and contract obligations, and fulfill other legitimate interests of Kelly. In most countries in which Kelly has an employment contract with you, the processing of contact, payroll, and benefit information is a contractual or statutory obligation, and failure to provide information to allow processing may restrict your ability to be employed by Kelly

You may have certain rights in relation to your personal data. The availability of these rights and the ways in which you can use them are set out below in more detail.

## European Privacy Rights

### European Privacy Rights

For individuals located in the European Economic Area (“**EEA**”) or Switzerland, Kelly complies with data protection laws in your country, and if applicable, you have the following rights:

- **Access:** You have the right to request access to your personal data. You are entitled to ask us if we are processing your personal data and, if we are, you can request access to your personal data. This enables you to receive a copy of the personal data we hold about you and certain other information about it.
- **Correction:** You are entitled to request that we correct inaccuracies (rectification) of your personal data. In response to your request, we will update any incomplete or inaccurate personal data we hold about you to ensure it is accurate and correct.
- **Erasure:** You have the right to request erasure of your personal data in certain circumstances, and subject to our obligations to maintain your information under applicable laws or if retention of your personal data is required in connection with claims.
- **Restriction:** You are entitled to ask us to suspend the processing of certain of your personal data, for example if you want us to establish its accuracy or the reason for processing it.
- **Transfer:** You may request to receive information you provided to us in a machine-readable portable format or the transfer of certain personal data to another party.
- **Automated decisions:** You may contest any automated decision made about you where this has a legal or similar significant effect and ask for it to be reconsidered.

### Right to object

For individuals located in the EEA or Switzerland, you have a right to object to Kelly processing your information in certain circumstances.

You have a right to **object** to Kelly's processing of your personal data where this is based on Kelly's legitimate interests (or those of a third party). You may challenge our reliance on legitimate interests. However we may be entitled to continue processing your personal data based on our legitimate interests or where this is relevant to legal claims. You also have the right to object where we are processing your personal information for direct marketing purposes.

You have the right to lodge a complaint with a Data Protection Authority, in particular in the Member State in the European Union where you are habitually resident, where we are based, or where an alleged infringement of Data Protection law has taken place.

Because processing your information is necessary to the performance of recruitment, placement, and employment or outsourcing services that we provide to you, a request to withdraw consent, object to

processing, or erase your information may result in Kelly being unable to continue providing its services such as recruitment, placement, employment, or outsourcing services. Subject to applicable law, Kelly may limit or deny requests or charge reasonable fees.

## Mexican Privacy Rights

### **Mexican Privacy Rights**

Kelly Services México, S.A. de C.V., hereinafter "KELLY", domiciled at Ave. Niños Héroes Number 1555, interior 103, Moderna Neighborhood, Zip Code 44190, Guadalajara, Jalisco, and with its webpage address at [www.kellyservices.com.mx](http://www.kellyservices.com.mx) is responsible for the use of general, financial, patrimonial, or sensitive personal data that you have disclosed or may come to disclose in connection to your employment relationship with Kelly, or with the job application you provided, if any, pursuant to the terms established by the Mexican Federal Law for Protection of Personal Data in Possession of Private Parties ("LFPDPPP").

You are entitled **to limit the use or disclosure** of your personal data for those purposes not required for our legal relationship, to avoid receiving job offers or promotional messages from Kelly to your phone number, mobile phone number, and/or e-mail address, expressing your refusal to continue receiving this type of messages through your e-mail by sending us such request to the following e-mail: [ARCO@kellyservices.com](mailto:ARCO@kellyservices.com). In addition to the foregoing, we inform you that at any time, you may **revoke** your authorization for the use of your personal data by sending an e-mail to [ARCO@kellyservices.com](mailto:ARCO@kellyservices.com).

In accordance with the LFPDPPP, you are entitled to **access** your personal data in Kelly's possession as well as to obtain details about their use, **rectify** them in case they are inaccurate or incomplete, **cancel** them when you consider that they turn out to be excessive or unnecessary for the purposes that justify their gathering, or **oppose** to their use for specific purposes (**ARCO rights**).

In order to allow Kelly to process your request, such request e-mail should be accompanied by the following information: (i) copy of official identification with photograph (IFE, current passport, professional certificate or military card), (ii) full name, (iii) complete current domicile, (iv) fixed and/or mobile phone number and (v) the reasons for requesting Kelly to **access** (whenever you want Kelly to inform you about the existence of your personal data); to **rectify** (whenever you want Kelly to rectify your personal data as they may be inaccurate or incomplete); to **cancel** (whenever you want Kelly to partially or completely eliminate your personal data); or to **oppose** (when you require Kelly to cease the use of your personal data).

In the event your request is authorized, in terms of the LFPDPPP, the return of the personal data will be free of charge, and you will have to pay the reasonable mailing expenses only or the cost of copies or other formats that are generated. Your request will be attended within a period no greater than 20 (twenty) business days.

If you consider that your right to data privacy has been infringed by any conduct of employees or by

our actions or responses or you believe that there is a violation to the provisions established by the LFPDPPP regarding the use of your personal data, you may submit a complaint or a claim before the Federal Institute of Access to Information and Data Protection. For further information visit [www.ifai.org.mx](http://www.ifai.org.mx).

## Other Privacy Rights

### **Other Privacy Rights**

Under the laws of some jurisdictions you may have the right to request additional information about the personal data we collect, request access to the personal data we process, correct an error or omission, delete personal data, or object or limit further processing. Kelly adheres to applicable data protection laws, and will respect individual rights requests under those laws.

Because processing your information is necessary to the performance of recruitment, placement, and employment, or outsourcing services that Kelly provides to you, a request to exercise certain rights may result in Kelly being unable to continue providing its services such as recruitment, placement, employment, or outsourcing services. Subject to applicable law, Kelly also may limit or deny requests or charge reasonable fees.

## Direct Marketing

### **Direct Marketing**

We may periodically use your contact information to send you updates via e-mail in order to alert you to opportunities or services relevant to your interactions with us, such as jobs in our database that match your selected criteria.

At the point where we request personal information about you, our site also gives you the opportunity to decide which communications you wish to receive. When your interactions with Kelly Services have resulted in your registration for multiple services or resources it may be necessary to opt out from each service separately.

You can opt-out of receiving direct marketing from us at any time. Each marketing communication will provide instructions on how to opt out of receiving similar e-mails from the registered service or resource. You can also opt-out by contacting the Data Protection Officer at [privacy@kellyservices.com](mailto:privacy@kellyservices.com).



## Cookies

We record the number of visitors to the relevant sections of our website and track movement between the sections by means of “cookies.”

Cookies are small data files containing information placed on your computer and are automatically downloaded to your device in order to recognize you as someone that has visited our website previously. We use cookies that identify your browser or device. They collect and store information when you visit our website about how you use it.

For more information about cookies, the types of cookies we use, and how we use them, please see our Cookie Policy.

## Protecting Your Information

Kelly Services takes care to secure your personal information.

We regularly monitor industry standards for securing information and review our physical, technical, and organizational security practices in order to determine how best to prevent the loss, misuse, alteration, unauthorized access, destruction, or disclosure of your personal information.

Any personal data sent to us, either in writing or e-mail, may be insecure in transit and we cannot guarantee its delivery.

Passwords must be kept confidential and not disclosed to a third party. Kelly does not ask you for your password.

## Updates to this Privacy Statement

Kelly may update this Privacy Statement from time to time, so please review it frequently.

If we change our Privacy Statement, we will post the revised version here and will describe the changes in the Change History section.

If we make significant changes to our Privacy Statement, we may also notify you by other means prior to the changes taking effect, such as, prominently posting a notice of such changes on our websites, providing notice of the change through our online portals, or by directly contacting you.

If you would like to access previous versions of this Privacy Statement contact the Data Protection Officer at [privacy@kellyservices.com](mailto:privacy@kellyservices.com).

## How to Contact Kelly

If you have any questions or comments about this Privacy Statement, would like to exercise any of your rights under applicable data protection law, or believe that Kelly has not adhered to this Privacy Statement, please e-mail our Data Protection Officer at [privacy@kellyservices.com](mailto:privacy@kellyservices.com). Additionally individuals can contact Kelly Services in the U.S. at:

Kelly Services, Inc.

ATTN: Privacy Officer  
999 W. Big Beaver Road  
Troy, MI 48084

Or in the EEA or Switzerland at:

Kelly Services Management Sàrl  
ATTN: Privacy Officer  
Av. Edouard-Dubois 20  
PO Box 48  
2006 Neuchâtel  
Switzerland

Those group companies listed who are not located in Europe can also be contacted through their representative:

Kelly Services (UK) Limited  
17 Union Street  
Kingston-upon-Thames  
Surrey. KT1 1RR  
+44(0)20 8481 1200  
Registration Number Z9253237

## Mexico Addendum

I agree for my sensitive personal data to be used in accordance with the terms and conditions of this Privacy Statement.

I consent that my personal data, including the general, sensitive, financial, and property-related information may be transferred in accordance with the terms and conditions of this Privacy Statement.

I hereby acknowledge that I understand and agree to the terms of this Privacy Statement. Furthermore, I hereby consent to the use of my general, sensitive, financial, and property-related personal data in accordance with the terms and conditions of this privacy notice. Likewise, I accept that my personal data is transferred in the terms established in this privacy notice. In the event that I am currently applying to a particular job position or vacancy at Kelly, with my signature in this document, I expressly acknowledge that this privacy notice does not imply any kind of relationship or job offer from Kelly since its objective is to comply with the obligations established in the Federal Law for Protection of Personal Data in Possession of Private Parties.

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Owner's Name and Signature

## Change History

### May 2018

- We updated the Privacy Statement to provide a more layered presentation of information.
- In "Information We Collect" we presented the information in a more user-friendly format.
- We renamed "How We Use the Information" to "Why We Use the Information" and provided additional transparency on Kelly's use of the information, including easier category groupings.
- We separated out and added information about the standards we use to determine how long data is maintained. This information is now in a separate section called "Retaining Your Information."
- In "Your Rights and Choices" we created easier groupings for privacy rights based on specific jurisdictions, and provided notification and additional transparency for the rights of those located in the EEA or Switzerland.
- In "Where Your Information May Be Shared" we provided additional transparency regarding the potential countries or areas where information may be shared.
- We developed and deployed a separate Cookie Policy to inform you about our use of cookies.
- In "Updates to this Privacy Statement" we provided additional clarification on how we would provide notice of significant changes to this Privacy Statement.
- We created a Change History section to show updates to this Privacy Statement.
- We made minor edits for clarity and grammar.

### April 2017

- We updated the Privacy Shield section to provide information about our compliance with the Swiss-U.S. Privacy Shield Framework.

### November 2016

- In "Where Your Information May Be Shared" we added additional transparency regarding our responsibility for our processor's actions.

### August 2016

- We updated "Safe Harbor" to "Privacy Shield" and provided information about our compliance with the EU-U.S. Privacy Shield Framework.

## Company Names and Information

<b>Company</b>	<b>Information</b>
Kelly Services, Inc.	PO Box 331179, ATTN Tax Department Detroit, MI 48266, United States
Kelly Global Business Services, LLC	PO Box 331179, ATTN Tax Department Detroit, MI 48266, United States
Kelly Innovation Fund LLC	PO Box 331179, ATTN Tax Department Detroit, MI 48266, United States
Kelly Outsourcing and Consulting Group Australia, Ltd.	PO Box 331179, ATTN Tax Department Detroit, MI 48266, United States
Kelly Properties, LLC	PO Box 331179, ATTN Tax Department Detroit, MI 48266, United States
Kelly Receivables Funding, LLC	PO Box 331179, ATTN Tax Department Detroit, MI 48266, United States
Kelly Services (Ireland), Ltd.	PO Box 331179, ATTN Tax Department Detroit, MI 48266, United States
Kelly Services of Denmark, Inc.	PO Box 331179, ATTN Tax Department Detroit, MI 48266, United States
Kelly Services Global, LLC	PO Box 331179, ATTN Tax Department Detroit, MI 48266, United States
Kelly Services USA, LLC	PO Box 331179, ATTN Tax Department Detroit, MI 48266, United States
Teachers on Call, Inc.	PO Box 331179, ATTN Tax Department Detroit, MI 48266, United States
Access KellyOCG GmbH	SCHANZENSTR 23, COLOGNE, 51063, Germany
Agensi Pekerjaan Kelly OCG Sdn Bhd	LOT 13 02 13TH FLOOR MCB PLAZA, 6 JALAN CHANGKAT RAJA CHULAN KUALA LUMPUR, 50200, Malaysia
Kelly Administratiekantoor, B.V.	Neptunusstraat 37, JA Hoofddorp, 2132, Netherlands
Kelly Investment And Consulting (Shanghai) Co., Ltd.	C/O Kelly Services Singapore, 10 ANSON ROAD 34 08 SINGAPORE, 079903, Singapore
Kelly Managed Services (Nederland) B.V.	Neptunusstraat 37, JA Hoofddorp, 2132, Netherlands
Kelly Management Services, S.r.l.	VIA Dante 7, Milan, 20123, Italy
Kelly OCG	6 Rue Des Bateliers, Clichy La Garenne, 92110, France
Kelly OCG Malaysia Sdn. Bhd.	
Kelly OCG Singapore PTE. LTD	8 Marina View, #11-01 Asia Square Tower 1, 018960, Singapore
Kelly Outsourcing & Consulting Group, S.a.r.l.	7 11 ROUTE D ESCH, Luxembourg, L-1470, Luxembourg
Kelly Outsourcing and Consulting Group (Austria) GmbH	
Kelly Outsourcing and Consulting Group India Pte. Ltd.	UNITECH CYBER PARK TOWER C 10TH FLOOR SECTOR 39, GURGAON 122002, India
Kelly Payroll Services Limited	Apple Market House, 17 Union Street, Kingston upon Thames, KT1 1RR United Kingdom
Kelly Services – Empresa De Trabalho Temporario, Unipessoal, Lda.	N 6 EDIFICIO ALTO DAS AMOREIRAS, 9TH AND 10TH B LISBON Portugal

Kelly Services – Gestao De Processos, Lda.	N 6 EDIFICIO ALTO DAS AMOREIRAS, 9TH AND 10TH B LISBON Portugal
Kelly Services (Canada), Ltd	1 University Avenue Suite 500, Toronto, M5J 2P1 Ontario, Canada
Kelly Services (Nederland) B.V.	Neptunusstraat 37 JA Hoofddorp, 2132 Netherlands
Kelly Services (Suisse), SA	20 Avenue Edouard Dubois CP 48, Neuchatel, CH2006, Switzerland
Kelly Services (UK) Limited	Apple Market House, 17 Union Street, Kingston upon Thames, KT1 1RR, United Kingdom
Kelly Services Brasil Investimentos E Participacoes II Ltda.	AVENIDA BERNARDINO DE CAMPOS 98, 14TH FLOOR RM 15 PARAISO, SAO PAULO, 04004-040, Brazil
Kelly Services Brasil Investimentos E Participacoes Ltda.	AVENIDA BERNARDINO DE CAMPOS 98, 14TH FLOOR RM 15 PARAISO, SAO PAULO, 04004-040, Brazil
LLC Kelly Services CIS	PROSPECT MIRA 33 1, MOSCOW, 129110, Russia
Kelly Services Do Brasil Recursos Humanos Ltda	Rua Mario Amaral 182, Paraiso, Sao Paulo, 04002-020, Brazil
Kelly Services France S.A.S.	6 Rue Des Bateliers, Clichy La Garenne, 92110, France
Kelly Services GmbH	BEIM STROHHAUSE 27, HAMBURG, 20097, Germany
Kelly Services Healthcare Unipessoal, Lda.	
Kelly Services Hungary Staffing Limited Liability Company	ARADI U 8 10, BUDAPEST, 1062, Hungary
Kelly Services Interim (Belgium) SPRL	63 Blvd Adolphe Max, Brussels, 1000, Belgium
Kelly Services Japan, Inc.	15 1 Konan 2 Chome, Minato Ku, Tokyo, 108-6110, Japan
Kelly Services Luxembourg, S.A.R.L.	7 11 Route D Esch, Luxembourg, Luxembourg
Kelly Services Management AS	Rosenkrantz gate 20, Oslo 0160, Norway
Kelly Services Management Sarl	20 Avenue Edouard Dubois CP 48, Neuchatel, CH2006, Switzerland
Kelly Services Mexico S.A. de C.V.	EJERCITO NACIONAL 579, PISO 5, COLONIA GRANADA, 11520 Mexico
Kelly Services Norge AS	Rosenkrantz gate 20 Oslo 0160, Norway
Kelly Services Outsourcing and Consulting Group SA/NV	JAN EMIEL MOMMAERTSLAAN 18B B-1831 DIEGEM, Belgium
Kelly Services Outsourcing and Consulting Group Sarl	20 Avenue Edouard Dubois CP 48, Neuchatel, CH2006, Switzerland
Kelly Services Poland Sp.zo.o.	UI Widok 8, Warsaw, 00 023, Poland
Kelly Services Recursos Humanos Ltda.	Rua Mario Amaral 182, Paraiso, Sao Paulo 04002-020, Brazil
Kelly Services S.p.A.	
Kelly Services, S.A.S.	6 Rue Des Bateliers, Clichy La Garenne, 92110 France
LLC Kelly Services IT solutions	
Opciones De Servicio En Mexico, S.A. de C.V.	PROSPECT MIRA 33 1, MOSCOW ,129110 Russia

QSM, S.A. de C.V.	AV NINOS HEROES NO 1555 103, COL MODERNA CP 44190, GUADALAJARA, JALISCO, Mexico
Toner Graham Limited	8 Imperial Square Cheltenham GL50 1QB, United Kingdom

# **Cookie Policy for Kelly Services, Inc. and its subsidiaries ("Kelly Services" or "Kelly")**

**Revision date: May 2018**

## **Kelly Services Website Cookie Usage**

Many Kelly websites use "cookies" to help personalize the online experience. A cookie is a piece of data stored on the user's computer or mobile device. Cookies allow us, among other things, to store your preferences and settings, enable you to sign-in, and analyze how our websites and services are performing. They allow us to identify those devices when they return to a site, in order to provide you with a more seamless experience, facilitating your use of Kelly's websites, and/or to aid Kelly in improving the user experience. You can set your browser to notify you before you receive a cookie, giving you the option of whether to accept it. You can also set your browser to turn off cookies. If you do so, areas of some sites may not function properly.

## **Types of Cookies Used**

### **Essential Cookies**

These are cookies that are strictly necessary to provide you with services available through Kelly's sites and to use some of its features, and they cannot be switched off in Kelly's systems. These cookies may gather certain pieces of information, such as Internet protocol (IP) address, browser type, Internet Service Provider (ISP), and browser setting information. This information is not stored after you end your session.

You can set your browser to block or alert you about these cookies, but some parts of the site will not work if they are blocked.

### **Performance Cookies**

These cookies allow us to measure and understand how our sites are used by visitors by identifying which pages are the most and least popular and where we can improve the performance of our site.



All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies, we will not know when you have visited our site and will not be able to monitor its performance.

### **Functionality Cookies**

These are cookies that are placed on your machine in response to a specific activity or request by you, such as logging in to areas of the site, in order to ensure the site provides you with the experience you have requested. These cookies may be persistent, meaning they will continue to function when you've started a new session, so that you don't have to log-in repeatedly. These cookies also enable Kelly to track and target the interests of our users to enhance the experience on the site.

These cookies may also collect the user's location-based information for the purposes of matching the user job search criteria on our career site. This information is only shared with the mapping provider for the sole purpose of providing the user with the location-based job search Service. The user may turn off any geo-locating tracking at the device level. By turning off the location tracking, any geographically based services on our Career Site will no longer be available to you.

### **Third-Party Cookies**

Kelly Services and our partners use cookies or similar technologies to analyze trends, administer this site, track users' movements around this site, and to gather information about our user base as a whole. Third-party cookies are also used to provide certain information from partner websites at the request of the user.

Our partners and service providers may use session cookies to anonymously track page interactions, which improves your site experience. Our third-party partners employ images and scripts that help them better manage content on our site.

Third Parties, with whom we partner to provide certain features on our sites or to display advertising based upon your Web browsing activity, use Flash cookies to collect and store information. Flash cookies are different from browser cookies because of the amount of, type of, and how data is stored. Cookie management tools provided by your browser will not remove Flash cookies. You can learn how to manage privacy and storage settings for Flash cookies, as described under the heading "How can I control cookies?" below.

Our third-party partners do not tie the information gathered to our user's personally identifiable information.

Users can control the use of the third-party cookies as follows:

**LinkedIn:** If a user logs into a Kelly site through a LinkedIn profile, or chooses to apply to a job posting via a LinkedIn profile, LinkedIn will use a third-party cookie on the Career Site. LinkedIn's policies are governed by a wholly separate privacy policy and questions related to LinkedIn's policies should be

directed to that entity. By using LinkedIn to log in to or provide information to our sites, you are consenting to the third-party cookie on the site.

**Dropbox:** If a user selects to upload any documents via a Dropbox account, Dropbox will use a third-party cookie on our site. Dropbox policies are governed by a wholly separate privacy policy and questions related to Dropbox's policies should be directed to that entity. By using Dropbox to provide information to our site, you are consenting to the third-party cookie on the Career Site.

**Google Drive:** If a user selects to upload any documents via a Google Drive account, Google Drive will use a third-party cookie on the site. Google Drive policies are governed by a wholly separate privacy policy and questions related to Google Drive's policies should be directed to that entity. By using Google Drive to provide information to the site, you are consenting to the third-party cookie on the Career Site.

**Google Maps:** Our sites provide geographical information for job applications. You can deny the use of this permission by declining the browser prompt to access your location information. By declining consent to the Google Maps cookie, certain features such as job distance, will be unavailable.

Kelly's sites also uses a third-party tracking service called Google Analytics that uses cookies to track non-personally identifiable information about visitors to our sites in the aggregate (browser version, geographic region, click path, and bounce rates) to improve the end user experience.

Note: For links to non-Kelly organizations, Kelly Services is not responsible for the privacy practices or the content of such websites. We recommend you review the terms and conditions of use and privacy policies in place on such websites.

## **Declining Cookies**

If you decline consent to cookies, you may still use our sites, but your ability to use some areas of the sites, will be limited. For example, you cannot receive job recommendations on the sites based on your browsing activity and the sites will not be able to personalize your experience. **You will still be able to apply for jobs through our job application forms, log in to sites using LinkedIn, join the Talent Community, or subscribe to Similar Job Alerts.**

## **How can I control cookies?**

On portions of Kelly's Career Page, Personalization and Performance cookies can be controlled by checking or unchecking your consent.

Additionally, you are able to control cookies from your browser-level settings. Each browser typically allows a user to enable, disable, block, allow, or remove cookies by visiting the settings, tools, or preferences tab that can be located within the browser itself. For additional questions regarding any specific browser, please contact your browser support directly.