

## 1CRM US PRIVACY POLICY

*Effective November 29, 2023*

Welcome to the Privacy Policy of Elevate Staffing, Inc.

We respect and value your privacy. This Privacy Policy (“Policy”) describes how we collect, use, and disclose information we collect from you through our staffing portal (the “Portal”). Elevate Staffing, Inc owns and operates this Portal. References in this Policy to “Elevate,” “we,” “our,” “us,” or “the Company” mean Elevate Staffing [and its subsidiaries and affiliates].

Please read this Policy carefully. If you do not agree with any term in this Policy, please do not use the Portal and refrain from providing any personal information to us. By using the Portal and providing your personal information voluntarily through the Portal will constitute your acceptance of this Policy and your consent for us to process your information as disclosed here.

This Portal is intended for those who are at least 18 years old. Please do not provide any personal information to us if you are not yet 18 years old.

### I. WHAT PERSONAL INFORMATION DO WE COLLECT

**Personal Information** or **Personal Data** means information that identifies, describes or is directly or indirectly related to an individual or a household, or that is reasonably capable of being associated with a particular individual or household. Personal information does not include protected health information as defined by the Health Insurance Portability and Accountability Act (HIPAA), or information subject to the Fair Credit Reporting Act. This also does not include anonymous data, or information that can’t be linked to a person because the identifying elements have been removed.

We may collect, use, store and transfer the following categories of Personal Information about you, which we have grouped together as follows:

- **Identifiers** including first name, last name, username or other similar identifier, nickname, date of birth, place of birth and gender; postal address, email address and telephone numbers; Internet Protocol (IP) address, your login data including your username and password,
- **Account Information** including bank account details (IBAN, BIC, account holder, credit institution).
- **Geolocation data**, including your general location when you check in and out of a work shift.
- **Internet or other similar network, browsing, or search activity** including your interactions with the Portal such as your log in times, metadata about updating and creating records, and your search history on the Portal.
- **Audio, electric, visual, thermal, olfactory, or similar information**, including voicemails, audio or video recordings of applicants, and

# elevate

interview videos.

- **Professional or employment-related information** including personal description, education, training, certifications, languages, resume, references, work experience, work preferences.

LONDON | LOS ANGELES | PARIS | BERLIN | VIENNA

[weareelevate.global](https://weareelevate.global)



## Non-publicly available educational information including your transcripts.

- **Communications** including the contents and metadata of our communications with you by email, text message (SMS or MMS), telephone call and our communications with you by mail.
- **Other personal information to create user profiles and the inferences drawn** including, for example, your interests, applications, preferences such as those for receiving communication and marketing information from us, and your reactions.
- **Cal. Civ. Code § 1798.80 personal information** to the extent not already included in the other categories listed here, including physical characteristics of height or clothing size where a uniform is required for the job.
- **Sensitive Personal Information:**
  - **Government identifiers** including identity cards, passports, work authorizations and driver's licenses.
  - Account access credentials, including your credentials to access the Portal. We do not collect your credentials to access your financial accounts.
  - Precise geolocation data
  - Racial or ethnic origin

**Our use of Sensitive Personal Information.** We only use the sensitive personal information that we collect as necessary to perform the services the average person would reasonably expect when requesting those services or for legal compliance purposes. We limit the use of Sensitive Personal Information to detecting security incidents, to maintaining the quality of our services, or for other purposes not granted the right to opt out under the California Consumer Privacy Act. Elevate does not infer characteristics from the sensitive personal information that we collect.

### If you do not provide personal data

Where we need to collect personal information by law or pursuant to a contract with you and you do not provide the requested data, we may not be able to perform the contract we have entered into or are trying to enter into with you. In this case, we will inform you at that time and we reserve the right to cancel a service you have contracted with us.

## II. WHAT NON-IDENTIFYING INFORMATION DO WE COLLECT

We also may collect, use, store and transfer the following types of non-identifying information:

- **Technical Data** including Internet Protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and

# elevate

other technologies on the devices you use to access this website.

- **Usage Data** including information about how you use our Portal.

LONDON | LOS ANGELES | PARIS | BERLIN | VIENNA

[weareelevate.global](https://weareelevate.global)



- **Aggregated Data and De-identified Data**, such as statistical or demographic data, for any purpose. Aggregated Data may be derived from your personal information but is not considered personal information within the meaning of the law, as it does not directly or indirectly identify you. For example, we may aggregate your Usage Data to calculate the share of users accessing a specific feature of the Portal. However, if we combine or connect the Aggregated Data with your personal information so that it can directly or indirectly identify you, we treat the combined data as personal information that will be used in accordance with this Privacy Policy.

### III. SOURCES FROM WHICH WE COLLECT YOUR PERSONAL INFORMATION

- **Direct interactions with you.** You may provide us with your personal information by filling in forms or corresponding with us, through the Portal, by mail, telephone, email correspondence or otherwise. This includes personal information you provide when you:
  - create an account on our Portal;
  - Set up your profile.
  - apply for a job and/or respond to a job invitation;
  - are involved in a recruitment process;
  - enter into a working relationship with us;
  - participate in an online training;
  - request that marketing actions or communications be sent to you; or
  - give us your opinion or contact us.
- **Service Providers.** We may collect personal information about you from our service providers, including our payroll provider.
- **Automated technologies or interactions.** When you interact with our Portal, we automatically collect Usage Data and Technical Data about your equipment, actions and browsing habits. We collect this personal data using cookies and other similar technologies. **COOKIES** are small text files placed on your device that uniquely identify your device and which a website can transfer to a user's hard drive to keep records of his or her visits to a website. We, or third parties, may use session cookies or persistent cookies. Session cookies only last for the specific duration of your visit and are deleted when you close your browser. Persistent cookies remain on your device's hard drive until you delete them or they expire. Both types of cookies enhance your user experience by recalling your use of the Internet and our Portal. We will treat this data as personal information only where the data, or the information it is associated with, can be individually identified to you or your device. Please see our [cookie policy](#) for more details about the specific cookies that we use and ways to manage cookies. Please note that if you reject cookies, you may still use our Portal, but your ability to

use some features or areas of the Portal may be limited.

- **MS Clarity and Google Analytics.** We use third party analytics tools to help us understand the users of the Portal. These tools use cookies to collect non-personally identifiable information including usage information and navigational information. The analytics tools provide use with aggregated data about the Portal's traffic and interactions, enabling us to improve the Portal experience.

**IV. HOW WE USE YOUR PERSONAL INFORMATION**

We will only use your personal information to the extent permitted by law. Most often, we will use your personal data in the following circumstances:

- When we obtain your consent.
- Where it is necessary for a business or commercial purpose, such as to perform a contract to which you are a party or to carry out transactions at your request before entering into such a contract.
- When we need to comply with a legal obligation to which we are subject.
- When it is necessary for us to exercise and enforce our rights or in defense of legal claims.

**Purposes for which we will use your personal information**

We have set out in the table below the business and commercial purposes for which we may use your personal information, and the categories of personal information that may be processed for that purpose. We may use certain categories of your personal information for multiple purposes.

Please contact us if you need details of the specific circumstance and business or commercial purposes process your personal data.

**a) Job application:**

Purpose/Activity	Personal Information Categories
Creating and managing a user account on the Portal:  (a) Creation of a member profile on the Portal; (b) Assistance in connection with your use of our Portal. (c) Improve the candidate experience by providing personalized job offers on the Portal tailored to 1CRM search history	(a) Identifiers (b) Profile (c) Communications (d) Internet browsing or search activity (e) Inferences (f) Usage Data
Providing our services in connection with your use of our Portal: (a) view and apply for our job offers (b) managing and tracking your requests within your account (c) Selection Process	(a) Identifiers (b) Profile (c) Communications (d) Internet browsing or search activity (e) Audio visual data, including photographs or video recordings, where required for the job for which you are applying, as stated in the job description (f) Educational information (g) Professional or employment related information (h) Physical characteristics or description, where

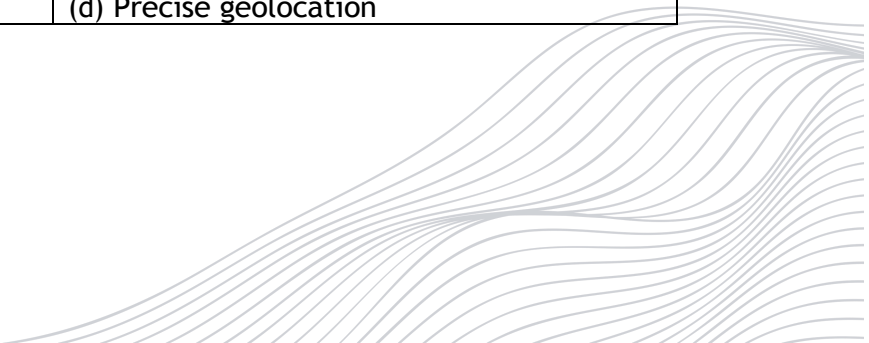
	required for the job for which are you applying as stated in the job description (i) Inferences
Sending you marketing information and communications: (a) notify you of changes to our Terms or Privacy Policy (b) ask you to leave a comment or complete a survey (c) send you job offers; (d) direct job security; (e) send you training invitations.	(a) Identifiers (b) Profile (c) Communications (d) Internet browsing or search activity (e) Professional or employment-related information (f) Inferences
Administer and protect our business and this Portal (including troubleshooting, data analysis, testing, system maintenance, support, reporting, and data hosting).	(a) Identifiers (b) Government identifiers (c) Technical Data (d) Profiles and Inferences
Use data analytics to improve our Portal, services and experiences.	(a) Technical Data (b) Usage Data (c) Aggregated Data

**b) Employment**

If you have been selected for employment, we may process your personal data as follows:

Purpose/Activity	Personal Information Categories
Managing your working relationship with Elevate:  (a) Establishment of the employment contract; (b) Payroll; (c) HR and other legal obligations.	(a) Identifiers (b) Government identifiers (c) Account information (d) Employment-related information (e) Signature (f) Health Insurance information (g) Communications
Providing adequate equipment if necessary for the work.	(a) Identifiers (b) Profile
Arrival and departure times on site	(a) Identifiers (b) Communications (c) Geolocation (d) Precise geolocation

**Limitation or Change of Purpose**





# elevate

We will only use your personal information for the purposes for which we collected it or another purpose which we disclose to you that is compatible with the original purpose. If you would like an explanation of the compatibility of the processing for the new purpose with the original purpose, please contact us.

LONDON | LOS ANGELES | PARIS | BERLIN | VIENNA

[weareelevate.global](https://weareelevate.global)



If we need to use your personal data for incompatible purposes, we will notify you to either get your consent or to explain the legal basis that allows us to do so.

Please note that if we are required to or permitted by law, we may process your personal information without your knowledge or consent, in accordance with the above rules.

## V. Disclosure of your personal data

We may share your personal data with the parties mentioned below for the purposes set out in the table above and other purposes as set forth in this section.

- Our end customers (brands) for whom we created the job posting, which may be based worldwide;
- Service providers and Contractors, including those who provide IT services in connection with 1CRM or providers of professional services, including lawyers, bankers, auditors, accountants and insurers, who provide consulting, banking, legal, insurance and accounting services.
- Our affiliated companies

We do not allow our third-party service providers to use your personal data for their own purposes and only allow them to process your personal data for specific purposes and in accordance with our instructions. We require all third parties to implement and maintain commercially reasonable technical, organizational, and administrative measures to protect the security of your personal information and to treat it in accordance with the law.

In the event of a merger or sale of business or assets, we may disclose your personal information to third parties to whom we may choose to sell, transfer or merge a portion of our business or assets. We may also seek to acquire or merge with other businesses. If there is a change in our business, the new owners will be able to use your personal data in the same way as set out in this privacy policy.

We may disclose your personal information if we are required to do so by law enforcement, or if we are otherwise under a legal obligation to make the disclosure. We may also disclose personal information if it is necessary to comply with the law or to protect the rights, property, and safety of Elevate, our users, and others.

## VI. Personal Information Sales and Sharing

Elevate does not Sell or Share your personal information as those terms are defined under applicable privacy laws.

## VII. International transfers of your personal information

Elevate and its affiliates operate in the US, Canada, and Europe, and we serve end clients worldwide. Occasionally we may need to provide access to or transfer your personal information outside of the country where it was originally provided to and/or collected by us.

*Transfers out of the EU.* Whenever we transfer your personal

elevate

information outside the European Union, we ensure that a similar level of protection is afforded to it by ensuring that at least one

LONDON | LOS ANGELES | PARIS | BERLIN | VIENNA

[weareelevate.global](https://weareelevate.global)



of the following safeguards is implemented: (1) we will only transfer your personal data to countries that have been considered to offer an adequate level of protection for personal information; or (2) when we use certain service providers, we may use standard contractual clauses that give personal data the same protection as it enjoys in the European Union.

Please contact us if you would like further information about the protections we use when transferring your personal information out of the country where it was collected.

## VIII. SECURITY

We take commercially reasonable, industry-standard measures to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. Your Personal Information is contained behind secured networks and is only accessible by a limited number of authorized personnel and service providers who have special access rights in order to do their jobs and are required to keep the information confidential. We work to protect the security of your information during transmission by using Secure Sockets Layer (SSL) software, which encrypts information you input.

Please keep in mind that no security measures can guarantee the complete safety of your Personal Information. Whenever you give out information online there is a risk that third parties may intercept and use that information. As a result, we cannot guarantee the security of any information you disclose online and you do so at your own risk. You should exercise caution when deciding to disclose or share your personal or other information.

## IX. How long do we retain your personal information?

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes for which we collected it, including to meet any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe that there is a prospect of litigation concerning our relationship.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal information and whether we can achieve those purposes by other means, as well as applicable legal, regulatory, tax, accounting or other obligations.

The retention periods for cookies or other identifiers are detailed in the Cookie Policy.

Your profile data will be retained throughout your use of the Portal and until your account is closed.

If we have entered into an employment relationship with you, the data will be retained for five

(5) years after the end of your employment relationship, unless applicable law provides otherwise.

In certain circumstances, we will anonymize or de-identify your personal data (so that it cannot reasonably be expected to identify you) for research or statistical purposes, in which case we may use this information indefinitely without notifying you.

**X. YOUR PRIVACY RIGHTS**

You may choose to withdraw your consent and opt out of receiving any promotional or marketing emails or newsletters from us. To unsubscribe from our email list, please follow the link to unsubscribe that is included in the email; or you may contact us at [1crm-us@weareelevate.global](mailto:1crm-us@weareelevate.global) to exercise your right to opt out. We will respond to your request within a reasonable time after receiving your request. Please note that you will not be able to opt-out of necessary communications related to your job assignments.

You have the right to request that we correct or modify the personal information that we collect about you. We encourage you to update your Personal Information promptly if it changes. You may contact us at [hr@weareelevate.global](mailto:hr@weareelevate.global) to exercise your right to correct or modify your Personal Information. We take reasonable steps to ensure that your Personal Information is accurate and kept up to date.

**PRIVACY RIGHTS FOR CALIFORNIA RESIDENTS**

You have various rights under Data Protection Laws, subject to certain exemptions, in connection with our processing of your personal data, including those set out in the table below.

Data Protection Right	Explanation
Right to Know	You have the right to know whether we collected, sold, shared, or disclosed for a business purpose the personal information we collected from you. You may request that we disclose to you (1) the categories of personal information we have collected about you; (2) the categories of sources from which that personal information is collected; (3) the business or commercial purpose for collecting, selling or sharing the personal information; (4) the categories of third parties to whom we disclosed personal information; (5) the categories of personal information that we sold, and for each category identified, the categories of third parties to which we sold that particular category of personal information; and (6) the categories of personal information that we sold, and for each category identified, the categories of third parties to which we sold that particular category of personal information.

Right to Correct	You may request to have inaccurate or incomplete information corrected and updated by us. You may also correct or modify your personal information by visiting your account.
Right to Delete	This right enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing. However, where we hold and process your personal data in order to comply with legal obligations, such as compliance with laws, or for the establishment, exercise or defense of legal claims, your right to ask us to delete or remove your personal information is limited.
Data Portability Right	You have the right to request specific pieces of personal information we collected about you, and, to request, where technically feasible, to that we provide your personal information in a readily usable format to be transmitted to another business.
Right to Non-discrimination	You have the right not to be discriminated against just because you have exercised any of the above consumer rights.

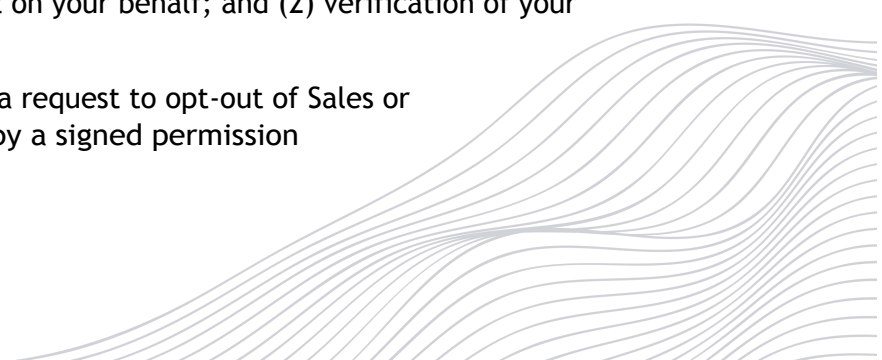
**HOW TO EXERCISE YOUR RIGHTS:**

You may exercise any of your rights by (1) submitting a request by email to [hr@weareelevate.global](mailto:hr@weareelevate.global); (2) calling us at (800) 850-6745; or (3) through the [form available](#). Please be aware that we may need to ask you to provide a few pieces of personal information that we can use to match against our records to verify your identity. We may not be able to act on your request should you decline to provide the verifying details.

If you are a California resident, you may be able to exercise your rights through the assistance of an authorized agent, as defined by the California Consumer Privacy Act. We must verify the authorized agent’s authority to act on your behalf prior to addressing your request.

Where the authorized agent is submitting a request to know, to correct, or to delete personal information, the request must be accompanied by: (1) a power of attorney that is valid under California law authorizing the agent to act on your behalf; and (2) verification of your own identity with us.

Where the authorized agent is submitting a request to opt-out of Sales or Sharing, the request must be supported by a signed permission



# elevate

demonstrating that the agent is authorized by you to act on your behalf.

LONDON | LOS ANGELES | PARIS | BERLIN | VIENNA

[weareelevate.global](https://weareelevate.global)



## XI. UPDATING YOUR PERSONAL DATA

We encourage you to keep your personal information accurate and up to date. You are responsible for notifying us of any changes to your personal information that you provide to us.

## XII. SHINE THE LIGHT REQUESTS.

If you are a California resident, California law allows you to request that we tell you what categories of Personal Information we disclosed to third parties for their direct marketing purposes in the previous twelve (12) months, and to whom we disclosed them. If you are California resident and would like to make such a request, please submit your request via email to [hr@weareelevate.global](mailto:hr@weareelevate.global) using the subject line “California Shine the Light Request.”

## XIII. DO NOT TRACK DISCLOSURE.

Some internet browsers include the ability to transmit “Do Not Track” signals. While we do not track IP addresses and where users come from or navigate to, we do not currently process or respond to “Do Not Track” signals. To learn more about “Do Not Track,” please visit “All About Do Not Track” at [www.allaboutdnt.com](http://www.allaboutdnt.com).

## XIV. INFORMATION ABOUT MINORS

Our Portal and services are not directed at minors, and we do not knowingly collect personal information from minors. We do not have actual knowledge that we Sell or Share the Personal Information of those under the age of 16. If you become aware that your child has provided us with personal information, without your consent, then please contact us using the details below so that we can take steps to remove such information and terminate any account your child has created with us.

## XV. LINKS AND THIRD PARTY CONTENT

Occasionally, our Portal may contain links to other websites, plug-ins, and applications, including websites of our partners or other third parties, which are not under our control. We provide these links on the Portal for our users’ convenience only and do not endorse those sites, companies or their products or services. Those third parties’ terms of use, privacy policy, and cookies policy apply to how they collect and process personal information at those sites. You are responsible for reviewing and understanding these other sites’ policies and adhering to their terms and conditions.

## XVI. CHANGES TO THIS PRIVACY STATEMENT





We regularly review our privacy policy and reserve the right to make changes to it without further notice to you as we may deem necessary or as may be required by law. The changes are effective when they are posted on this page. You should check this page from time to time to keep up to date on our most current policies and practices.

## **XVII. HOW TO CONTACT US**

If you have any questions about the Portal or our Privacy Policy, please contact us by (1) sending us an email at [hr@weareelevate.global](mailto:hr@weareelevate.global), and use “Privacy Inquiry” in the subject; (2) calling us at 1 (800) 850-6745; or (3) sending us mail at Elevate Staffing, Inc., 675 Ponce De Leon Ave NE Suite 7500, Atlanta, GA 30308.

4857-5261-2752, v. 3

