ManpowerGroup Global Privacy Policy

Effective Date: February, 2017

ManpowerGroup – Global Privacy Policy 02-2017

We at ManpowerGroup Inc., along with our subsidiaries and affiliates ("ManpowerGroup"), respect your concerns about privacy.

Manpower GmbH & Co. KG Personalidentitätssteuerung sowie Statistik: Es wird keine Bedeutung in handling data related to persons responsibly and informing you about our data processing activities. You also have the opportunity of familiarizing yourself with the international data privacy policy. You will find more information about this on our homepage (www.manpower.de) and at the Manpower-Group branch establishments.

This Global Privacy Policy applies to (1) our job candidates and freelancers, (2) our employees and associates, who are people we source or place on assignment with one of our clients, or individuals to whom we provide career transition services, (3) users of the websites and apps listed in http://www.manpowergroup.com/wps/wcm/connect/manpowergroup-en/home/Privacy/Apps+and+Sites, and (4) representatives of our clients and vendors.

This Policy does not apply to our headquarters and country-based staff employees, who are individuals employed by ManpowerGroup and who do not work directly for ManpowerGroup and not directly with a ManpowerGroup client.

The Policy describes the types of personal information we collect, how we use it, where we store it, how we share it with others, how you can contact us about our use of your information. We also describe the measures we take to protect the security of the personal information that we receive, and how you can contact us about our privacy practices and to exercise your rights.

Our Privacy Policy may vary among the countries in which we operate to reflect local practices and legal requirements. You can view our country-specific information at http://www.manpowergroup.com/wps/wcm/connect/manpowergroup-en/home/Privacy/Country+Addenda.

Information We Collect

We collect personal information about you in various ways, such as through our websites and social media channels, at our events and through phone and fax, through job applications and in connection with in-person recruitment, and in connection with our interactions with clients and vendors.

We collect, process, and store the data related to your person which you have given us as an applicant or freelancer, in accordance with the provisions of the Federal Data Protection Act (BDSG) and only inasmuch as this is necessary to fulfill our contractual and/or statutory obligations, these being especially:

- in order to contact you and maintain this contact (such as name, postal address, email address, and phone number);
- for sending you offers and campaigns (e.g., open-day, further education, marketing, etc.), also via e-mail and SMS;
- to offer you further job offers and projects after the first recruitment phase, but after rejecting your previous application;
- other information you may provide to us, such as in surveys or through the “Contact Us” feature on our sites.

Your personal data are forwarded for these purposes to our national and international clients, Manpower branches, Manpower subsidiary companies, and the Manpower parent company – within the scope of the contractual obligations. With your application, your personal data are stored in our central database at our parent company, Manpower Inc. USA.

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

- employment and education history; listing of projects;
- language proficiencies and other work-relevant skills;
- social security number, national identifier, or other government-issued identification number;
- date of birth;
- gender;
- bank account information;
- citizenship and work authorization status;
- disabilities and health-related information;
- results of drug tests and criminal and other background checks;
- benefits information;
- tax-related information;
- information provided by references; and
- information contained in your resume or CV.

We also collect and store information you provide regarding your career interests and other information about your qualifications for employment.

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

In the event that an employment contract or a service contract with you comes into being, we collect, process, and store your personal data you have given us as an employee or freelancer, or which comes into being during your employment or service, in accordance with the provisions of the Federal Data Protection Act (BDSG) and only inasmuch as this is necessary to fulfill our contractual and/or statutory obligations, these being especially:

- in order to contact you and duly implement your employment contract;
- to render any due necessities arising within the context of employee e-mail distress (e.g., providing protective clothing, access cards, etc.) or within the context of projects (e.g., software)
- for processing within the context of national and international enterprise management, such as country- and client-specific statistics and evaluations;
- to process and defend lawful entitlements or revert complaint litigation, comply with court or official orders and other statutory obligations at international server locations;
- for inclusion in a specialist network so that we are able to offer you matching job offers and projects.

Information Collected by Automated Means

When you visit our sites, we may collect certain types of information by automated means, such as cookies, web beacons, and server logs. The information we may collect in this manner includes IP addresses, website or 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 user interaction 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 settings in the browser. A “web beacon” also known as an Internet tag, pixel tag, GIF, links web pages to web servers and their cookies and is used to transmit information to ManpowerGroup Inc. (unrelated 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 site. As the visitor clicks through the website, a record of the action may be collected and shared. 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 received certain types of communications or how to restrict or disable certain types of cookies. Please note, however, that certain cookies you may not be able to stop from being virtually all of the features of our sites. To the extent required by applicable law, we will obtain your consent before collecting personal information using cookies or similar automated means.

The providers of third-party apps, widgets, tools, 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 subject to the privacy policies or notices of these providers. Subject to applicable law, we will obtain your consent before collecting personal information using cookies or similar automated means.

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 how you use our sites. The information collected through these means (including IP address and other information) will be used by 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 http://www.google.com/policies/privacy/partners/ and any sites contained in the country-specific addenda.

Google Analytics: https://tools.google.com/dlpage/gaoptout
Adobe Analytics: http://www.adobe.com/privacy/analytics.html

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 may also obtain information for this purpose from third-party websites on which our ads are served. This section of our Global Privacy Policy describes in detail and explains how to exercise your choices.

You may see certain 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, and contextual networks. Through the advertising networks we may track your online activities over time by collecting information through high automated means, including through the use of third-party cookies, web server logs, pixels, and web beacons. The information we thus collect to inform you about advertisements that may be tailored to your individual interests. The information our advertising networks collect includes data about your visits to websites that some ManpowerGroup associates, such as your name or other identifiers you view and the actions you take on the websites. This

1) The male gender is used only for ease of reading, but refers equally to men or women.

apply to a position, as permitted under local law, we use the information described in this Global Privacy Policy to:

- provide you with job opportunities and possible career transitions;
- provide HR services to you, including administration of benefit programs, payroll, performance management, and discipline actions;
- provide additional services to you, such as training, career counseling, and career transition services;
- assess your suitability as a job candidate and freelancer for positions; and
- perform data analytics, such as (i) analyzing our job candidate or freelancer; (ii) assessing performance and capabilities, including scoring on work-related skills; (iii) identifying site visit ages; (iv) using information to match individuals and potential oppor- tunities, and (v) analyzing pipeline data (trends regarding hiring practices).

We also use the information in other ways for which we will give you specific notice at or prior to the time of collection.

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

Method Of Information Collection

On our websites, we may use the information in other ways for which we will give you specific notice at or prior to the time of collection.

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

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 how you use our sites. The information collected through these means (including IP address and other information) will be used by 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 http://www.google.com/policies/privacy/partners/ and any sites contained in the country-specific addenda.

Google Analytics: https://tools.google.com/dlpage/gaoptout
Adobe Analytics: http://www.adobe.com/privacy/analytics.html

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 may also obtain information for this purpose from third-party websites on which our ads are served. This section of our Global Privacy Policy describes in detail and explains how to exercise your choices.

You may see certain 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, and contextual networks. Through the advertising networks we may track your online activities over time by collecting information through high automated means, including through the use of third-party cookies, web server logs, pixels, and web beacons. The information we thus collect to inform you about advertisements that may be tailored to your individual interests. The information our advertising networks collect includes data about your visits to websites that some ManpowerGroup associates, such as your name or other identifiers 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 http://www.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 We Share

We do not disclose personal information we collect about you, except as described in this Global Privacy Policy or in separate notices provided in connection with particular activities. We share personal information 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 information (i) with our subsidiaries and affiliates; (ii) if you are a job candidate or freelancer, with clients who may have job opportunities or projects available or interested in placing our job candidates or freelancers; and (iii) with others with whom we work, such as job placement consultants and subcontractors, to find you a job and/or a project.

In addition, we may disclose information 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 information we have about you in the event we sell or transfer all or part of our business or assets (including in the event of a reorganization, dissolution, or liquidation).

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.

Your Rights And Choices

We offer you certain choices in connection with the personal information we collect about you and how we communicate with you. To update your preferences, ask us to remove your information from our mailing lists, exercise your rights, or submit a request, please contact us as indicated in the “How to Contact Us” section of this Global Privacy Policy. To the extent provided by the law of your jurisdiction, you may request access to the personal information we maintain about you or request that we correct, amend, delete, or block the information by contacting us as indicated below. Where provided by law, you may withdraw any consent you previously provided to us or object at any time on legitimate grounds to the processing of your personal information, and we will apply your preferences going forward. To learn more about how to opt out of ad network interest-based advertising, please visit the consumer opt-out page at: http://www.aboutads.info/choices/.

Notice to California Residents

Subject to certain limitations, California residents may ask us to provide them with (i) a list of the 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.

Data Transfers

We transfer the personal information 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 information. When we transfer your information to other countries, we will protect that information as described in this Global Privacy Policy.

If you are located in the European Economic Area (“EEA”) or Switzerland, we will comply with applicable legal requirements providing adequate protection for the transfer of personal information to recipients in countries outside of the EEA or Switzerland.

How We Protect Personal Information

We maintain administrative, technical, and physical safeguards designed to protect the personal information you provide against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use. Your data is forwarded anonymized wherever possible after concluding adequate contracts with the third party and only in accordance with the provisions of data protection law and under the principle of confinement to the proper purpose.

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.

Updates to Our Global Privacy Policy

This Global Privacy Policy (including any addenda) may be updated periodically to reflect changes in our personal information practices. For significant changes, we will notify you by posting a prominent notice on our sites indicating at the top of the Policy when it was most recently updated.

How to Contact Us

If you have any questions or comments about this Global Privacy Policy, would like to exercise your rights, or would like us to update information we have about you or your preferences, please write to:

ManpowerGroup Inc.
Attn: General Counsel
100 Manpower Place
Milwaukee, WI 53212

If you are in the European Union, please contact:

Expats
Attn: Director of Legal Affairs, EMEA
The Helicon
One South Plaza
London EC2M 2RB
United Kingdom

From within Germany:
datenschutz(at)manpower.de
Manpower GmbH & Co. KG
Personaldienstleistungen
Datenschutzbeauftragter
Düsseldorfer Straße 9
60576 Eschborn

I have understood the foregoing notices and information concerning processing, use, transmission, and storage of my data within the ManpowerGroup, its clients, and contract partners, also in countries outside Europe, and my questions to this have been answered. I am agreed with these procedures.

Please bear in mind that without the signed data privacy statement we shall be unable to continue processing your application.

Place, date, signature

Agreement

A separate agreement is required here because particular types of data related to persons (e.g., religion, severely disabilted status, marital status) are collected, processed, and stored on databases and servers in countries outside Europe for the aforesaid purposes within the context of employment relationships, service contracts and returns or CIs. The agreement can be revoked at any time in writing. Data processing remains otherwise admissible inasmuch as permitted or stipulated by other statutory fundamentals. I herewith agree to the lawfully admissible collection and processing of particular types of personal data as described above.

I hereby declare that, in the event of leaving, a certificate of employment is to be made available as soon as possible by means of electronic transmission to the Employment Agency. If, at any time, objection to the electronic transmission of the data without stating reasons.

Place, date, signature

All employees and third parties involved in data processing and our contract partners are obligated to treat data related to persons as confidential in accordance with the Federal Data Protection Act.