



# Privacy Policy

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Last Updated 12/31/19

# Overview

ASGN Incorporated and its affiliates (“the Company”, “we”, “our” or “us”) are committed to protecting the privacy and security of your personal information. ASGN Incorporated’s affiliates include Apex Systems, LLC, Creative Circle, LLC, CyberCoders, Inc., ECS Federal, LLC, Oxford Global Resources, LLC, and such other affiliates as we may acquire or launch from time to time.

This Privacy Policy describes how the Company may use and disclose information that we may collect about you through our websites. This Privacy Policy also tells you about your rights and choices with respect to your personal information, and how you can reach us to get answers to your questions.

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# Information We Collect About You

For the purposes of this Privacy Policy, “personal information” means any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual, regardless of whether it is held in paper, electronic or any other format.

We collect, maintain, and use different types of personal information in the context of our relationship or potential relationship with you. The following provides examples of the type of information that we collect from you and how we use the information.

<b>Context</b>	<b>Categories of Information</b>	<b>Primary Purpose for Collection and Use of Information</b>
Information about Clients	We collect the name, and contact information, of our clients and their employees with whom we interact.	We have an interest in communicating with our clients concerning normal business administration such as projects, services, and billing.
Cookies and First Party Tracking	We use cookies and clear GIFs. “Cookies” are small pieces of information that a website sends to a computer’s hard drive while a web site is viewed.	We have an interest in making our website operate efficiently.
Cookies and Third Party Tracking	We participate in behavior-based advertising, this means that a third party uses technology (e.g., a cookie) to collect information about your use of our website so that they can provide advertising about products and services tailored to your interests on our website, or on other websites.	We have a legitimate interest in engaging in behavior-based advertising.
Email Interconnectivity	If you receive email from us, we use certain tools to capture data related to when you open or interact with our messages.	We have an interest in understanding how you interact with our communications to you.
Feedback/Support	If you provide us feedback or contact us for support we will collect your name and e-mail address, as well as any other content that you send to us, in order to reply.	We have an interest in receiving, and acting upon, your feedback or issues.
Mailing List	When you sign up for one of our mailing lists we collect your name, email address or postal address.	We share information about our services with individuals that consent to receive such information. We have an interest in sharing information about our services.
Website interactions	We use technology to monitor how you interact with our website. This may include which links you click on, or information that you type into our online forms. This may also include information about your device or browser.	We have an interest in understanding how you interact with our website to better improve it. We also have an interest in detecting and preventing fraud.
Web logs	We collect information, including your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to a computer when the Internet is used), domain name, click-activity, referring website, and/or a date/time stamp for visitors.	We have an interest in monitoring our networks and the visitors to our websites.

In addition to the information that we collect from you directly, we may also receive information about you from other sources, including third parties, business partners, our affiliates, online job sites, or other publicly available sources.

# How We Use Your Personal Information

In addition to the purposes and uses described above, we use your personal information for the following purposes:

- To provide services to your business or employer;
- To conduct analytics;
- To respond to inquiries related to support, employment opportunities, or other requests;
- To send marketing and promotional materials, including information relating to our services;
- To comply with laws or regulations to which the Company is subject;
- To comply with our contractual obligations;
- To detect and prevent fraud or crime;
- To enforce, exercise, or defend legal claims;
- To investigate potential misconduct; and
- For internal administrative purposes, as well as to manage our relationships.

Note that this Privacy Policy may be updated to notify you of additional purposes for which we process your personal information.

# Sharing Your Personal Information

In addition to the specific situations discussed elsewhere in this policy, we share your personal information in the following situations:

- **Affiliates and Business Transfers.** We may share information with our corporate affiliates (e.g., parent company, sister companies, subsidiaries, joint ventures, or other companies under common control) in the course of our normal business operations. If another company acquires, or plans to acquire, any part of our company, business, or our assets, we will also share information with that company, including at the negotiation stage.
- **Legal or Regulatory Requests and Investigations.** We may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws or regulations. We may also need to share your personal information with tax authorities, courts, regulators, the police and other governmental authorities where we are required or permitted to do so by law.
- **Other Disclosures with Your Consent.** We may ask to share your information with other unaffiliated third parties who are not described elsewhere in this Privacy Policy.
- **Protection of the Company or Others.** We may share your information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies.
- **Third-Party Service Providers.** We may share your information with service providers. Among other things, service providers may help us to administer our website, provide technical support, and assist in the fulfillment of services.

# Data Security

We maintain reasonable physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to help protect your personal information against loss, unauthorized access or disclosure, modification, or destruction. While we use reasonable efforts to protect your personal information, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of any privacy or security event relating to your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

# Your Rights in Relation to Your Personal Information

You can make the following choices regarding your personal information:

- **Notification of Employment Opportunities.** You may choose to provide us with your email address for the purpose of allowing us to send employment opportunities to you. You can stop receiving these emails by following the unsubscribe instructions in e-mails that you receive. If you decide not to receive these emails, we may still send you service related communications.
- **Request access to your personal information.** If required by law, upon request, we will grant you reasonable access to the personal information that we have about you. There may be instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information we hold about you.
- **Request deletion of your personal information.** You may request that we delete your personal information. There may be instances where applicable law or regulatory requirements allow or require us to refuse a deletion request. For example, we may keep your personal information as needed to comply with our legal obligations, resolve disputes, and/or enforce any of our agreements.
- **Object to the sale of your personal information.** California residents may be entitled to object, or opt-out, of having their information sold to third parties. The Company does not sell your information to third parties.
- **Online Tracking.** We do not currently recognize automated browser signals regarding tracking mechanisms, which may include "Do Not Track" instructions.

If you would like to exercise any of the above rights (to the extent these rights are provided to you by law), you may:

1. Call us at 800-536-1390; or
2. [Submit your request online.](#)

Note that, as required by law, we may require you to prove your identity. We may conduct an identity verification by phone call, email, or in person.

We do not discriminate against California residents who exercise any of their rights described in this policy.

# Miscellaneous

The following additional information relates to our privacy practices:

- **Changes To This Privacy Policy.** We may change our privacy policy and practices over time. To the extent that our policy changes in a material way, the policy that was in place at the time that you submitted personal information to us will generally govern that information unless we receive your consent to the new privacy policy. We will note the effective date of the latest version at the end of the Privacy Policy.
- **Accessibility.** ASGN is dedicated to providing an equivalent digital experience for our guests, regardless of physical or cognitive ability. This Privacy Policy is accessible to all – including those who rely on assistive technology.
- **Minors.** This site is not intended for use by children under the age of 13, and we do not knowingly collect or use any personal information from such children.
- **Information for California Residents.** California Civil Code 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 indicate that organizations should disclose whether certain categories of information are “sold” or transferred for an organization’s “business purpose” as those terms are defined under California law. You can find a list of the categories of information that we share here. Please note that because this list is comprehensive it may refer to types of information that we share about people other than yourself. We do not discriminate against California residents who exercise any of their rights described in this Privacy Policy.
- **Contact Information.** If you have any questions about this Privacy Policy, please us contact at [myprivacy@creativecircle.com](mailto:myprivacy@creativecircle.com).
- **Effective Date.** This policy is effective as of December 31, 2019.
- **Last Revised:** December 31, 2019

# California Information Sharing Disclosure

California Civil Code Sections 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 indicate that organizations should disclose whether the following categories of personal information are collected, transferred for “valuable consideration,” or transferred for an organization’s “business purpose” (as those terms are defined under California law). The table below indicates the categories of personal information we collect and transfer in a variety of contexts. Please note that because this list is comprehensive, it may refer to types of information that we collect and share about people other than yourself.

Category of Personal Information	Is information collected by us?	Is information transferred for valuable consideration?	Is information transferred for business purposes?
Audio, electronic, visual, thermal, olfactory, or similar information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Bank account number	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Biometric information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Characteristics of protected classifications (e.g., age, sex, race, ethnicity, physical or mental handicap, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Commercial information (e.g., products or services purchased, or other purchasing or consuming histories or tendencies)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Credit card number	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Debit card number	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Driver’s License Number / State ID	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Education	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Electronic network activity (e.g., browsing history)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Email address	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Employment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Employment history	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Geolocation data	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Health insurance information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Identifiers (e.g., name or alias)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Insurance Policy Number	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Medical information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Online identifier (e.g. IP address)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other financial information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Passport Number	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Physical Characteristics	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Postal address	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Signature	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Social Security Number	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Telephone Number	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Transaction information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>