



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 collects, uses, shares, and safeguards personal information about you before, during, and after your working relationship with us. 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.

This Privacy Policy applies to all job applicants, permanent and temporary employees, workers, contractors and any other individuals who are working for the company but are not directly employed (“staff member” or “you”). **Please note that because this Privacy Policy is comprehensive, it may refer to types of information that we collect and share about people other than yourself.**

This Privacy Policy covers:

|   |          |
|---|----------|
| 1. Information We Collect About You                     | 1        |
| 2. How We Collect Your Personal Information             | 3        |
| 3. Monitoring Use of Company IT Equipment and Systems   | 4        |
| 4. How We Use Your Personal Information                 | 4        |
| 5. Sharing Your Personal Information                    | 5        |
| 6. Data Security  | 5        |
| 7. Your Rights in Relation to Your Personal Information | 6        |
| 8. Other Important Information                          | 7        |
| <b>California Information Sharing Disclosure</b>        | <b>8</b> |

## 1. 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.

| Context  | Categories of Information   | Primary Purpose for Collection and Use of Information  |
|----------|---|--|
| Benefits | Wage and benefit information, including but not limited to salary, bonus, additional pay, variable compensation, annual leave, retirement savings plans and related | To provide employee benefits, including health insurance, expense reimbursements, etc. Our interest in maintaining accurate business accounts. |

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|  | compensation history and benefits information.  |  |
| <b>Closed Circuit TV and Facilities Access</b>           | CCTV footage and other information obtained through electronic means such as key fob/swipe card records and geolocation.  | To protect the Company's property, and maintain the security of information held by the Company and the security of its facilities.  |
| <b>Certifications and Qualifications</b>                 | We collect information from individuals who have access to our facilities and equipment including licensing and certification, and when applicable, nationality and citizenship.  | To secure our facilities and equipment, and track those individuals with access to either for security and maintenance purposes. In some jurisdictions, we are also required by law to validate and record information about the individuals that access our facilities and equipment. We have an interest in complying with all legal requirements to collect information in the countries in which we operate. |
| <b>Contact Details</b>                                   | Personal contact details such as name, title, addresses, telephone numbers, including your mobile number, and work and personal email address.  | To communicate with you, including regarding your application process, reminders, and documentation we may need to collect. In some jurisdictions, we are also required to collect this information to comply with law.  |
| <b>Electronic Communications</b>                         | Information about your use of our information and communications systems.   | To monitor your use of our information and communication systems and provide for security of the IT system to ensure compliance with our IT policies.  |
| <b>Government Identification</b>                         | Social security numbers, tax payer identification numbers, passport   | To comply with law.  |
| <b>Health Related</b>                                    | Information about your health, including any medical condition, health and sickness records, details of any absences from work (other than holidays), including time on statutory parental leave and sick leave.  | To ascertain your fitness to work, manage sickness absence. To comply with legal obligations related to health and safety. To provide health benefits such as insurance.   |
| <b>Identification</b>                                    | Name, date of birth, and driver's license.  | To identify you personally.  |
| <b>Interviews and Meetings</b>                           | Audio and video   | Engaging with applicants and employees who are applying from or working in a remote location.  |
| <b>Investigations</b>                                    | Details of any disciplinary investigations and proceedings, or of investigations following an alert.  | To gather evidence for possible grievance or disciplinary hearings, or to make arrangements for the termination of our working relationship if warranted. To determine whether you, or another employee, has complied with our policies, procedures, and protocols.  |
| <b>Other Special Categories Of Sensitive Information</b> | Information about your gender, race, ethnicity, sexual orientation, religious beliefs, and health and disability data.  | To comply with government regulations and our interest in promoting and monitoring equal opportunities and diversity (if permissible under local applicable law).  |
| <b>Payroll, Retirement Savings Plans, and Taxes</b>      | Payroll information, including but not limited to social security number or equivalent, tax status information (i.e., marital status, dependents, etc.), payroll records, bank account details, direct deposit/credit arrangements, and information about retirement savings plans. | To calculate and pay your salary, tax, social security, and retirement savings plan contributions. In some jurisdictions, to comply with legal obligations.  |
| <b>Photographs</b>                                       | Photographs   | Our interest in maintaining external and internal directories and/or a security badge (if applicable). We may additionally use photographs for marketing purposes.   |

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|-----------------------------------|--|--|
| <p><b>Recruitment</b></p>         | <p>Recruitment information, including copies of right to work documentation such as citizenship, work permit or visa; references and other information included in a CV, resume, or cover letter or as part of the application process; criminal background; references and interview notes; letters of offer and acceptance of employment, and employment agreements.</p> | <p>Our interest in making a decision about your recruitment or employment. In some jurisdictions, to comply with legal requirements to verify you are legally entitled to work in the country in which you are applying.</p>   |
| <p><b>Surveys</b></p>             | <p>If you participate in a survey we will collect information that you provide through the survey. If the survey is provided by a third party service provider, the third party's privacy policy applies to the collection, use, and disclosure of your information.</p>   | <p>We have an interest in understanding your opinions, and collecting information relevant to our Company.</p>   |
| <p><b>Terms of Employment</b></p> | <p>Employment records including job titles/duties, job location, working arrangements, seniority data, employee identification number, performance ratings, hire/re-hire date, termination date, job history, training records, professional memberships, and business travel arrangements.</p>  | <p>Our interest in business management and planning, including accounting and auditing; conducting performance reviews, managing performance and determining performance requirements; making decisions about salary reviews and compensation; assessing qualifications for a particular job or task, including decisions about promotions; making decisions about your continued employment or engagement. To provide salary and benefits to certain employees.</p>   |
| <p><b>Training</b></p>            | <p>We collect information from individuals concerning the training that they receive from us, or from third parties.</p>   | <p>Our interest in understanding and recording the qualifications and training of the individuals that work with us. We may also be required by law, or by contract, to share the training or qualification of certain staff with third parties such as regulators or clients. We may also choose to share the training or qualification of certain staff with third parties as part of our effort to develop business. We have an interest in complying with any statutory, regulatory, or contractual obligation to disclose the training of our staff, and we have an interest in using the qualifications of our staff to help development business.</p> |

## 2. How We Collect Your Personal Information

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, or publicly available sources. For example, through the application and recruitment process, we collect personal information about staff members either directly from candidates or sometimes from an online job site or background check provider where background checks are permitted. In addition, we may sometimes collect additional information from third parties including former employers, personal and professional references, credit reference agencies or other background check agencies, or government agencies (where permitted). By providing a mobile phone number, you agree to receive text messages from the Company. Text messages will be sent to notify you of a position or keep you updated on activities relevant to your application process, which may include reminders.

We will also collect additional personal information in the course of job-related activities throughout the period of you working for us. This may include monitoring communications and use of company IT equipment and systems, or from other staff members or supervisors.

### **3. Monitoring Use of Company IT Equipment and Systems**

In the course of conducting our business, we may – under conditions permitted by applicable law- monitor employee activities and our premises and property. For example, some of our locations are equipped with surveillance cameras. Where in use, surveillance cameras are for the protection of employees and third parties, and to protect against theft, vandalism and damage to the Company’s property. They do not aim at controlling the working activity of the individual employee. Recorded images are typically destroyed and not shared with third parties unless there is suspicion of a crime or wrongdoing, in which case they may be turned over to the police, or other appropriate government agency or other appropriate third parties.

Additionally, where permitted by law, we have the ability to monitor all business communications, including, without limitation, phone, internet browsing, email, instant messaging, and VoIP. For the purposes of your own personal privacy, you need to be aware that such monitoring might reveal sensitive personal data about you if you include such information in a business communication. By carrying out such activities using the Company’s facilities you acknowledge that sensitive personal data about you may be revealed to the Company by such monitoring.

### **4. 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 administer your relationship with us, including fulfilling any obligation that we have to provide you with compensation or benefits;
- To carry out our business effectively;
- To comply with laws or regulations to which the Company is subject;
- To comply with our contractual obligations;
- To conduct analytics;
- To detect and prevent fraud or crime;
- To enforce, exercise, or defend legal claims;
- To investigate potential misconduct;
- To keep your personal data and that of other staff members secure and to prevent unauthorised access, loss, damage, destruction or corruption of data. This may include monitoring communications and use of company IT equipment and systems;
- To authorize, grant, administer, monitor and terminate access to or use of the Company systems, facilities, records, property and infrastructure;
- To plan, organize, and carry out administration tasks within the Company; and
- To protect the interests of the Company, including protecting the Company property.

Although the sections above describe our primary purpose in collecting your information, in many situations we have more than one purpose. Our collection and processing of your information is based in different contexts upon your consent, our need to perform a contract, our obligations under law, and/or our general interest in conducting our business. Note that this Privacy Policy may be updated to notify you of additional purposes for which we process your personal information.

## 5. 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 administrative proceeding, 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.
- **Prospective Job Placements.** We may share information such as your name, training and qualification records, certifications, and other information relevant to your candidacy with our clients, in order to facilitate your temporary or permanent job placement.
- **Other Third-Parties.** We may disclose certain information such as name, work contact details (including your workplace ID photo), training and qualification records, certifications, and other information about your work arrangements to other third parties, such as professional advisers (including lawyers, auditors and accountants), professional bodies, and regulatory authorities in the normal course of business.
- **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. For example, we may share your personal information with payroll administrators, IT service providers, training providers, benefits providers, security providers, and marketing/events providers.

## 6. 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.

Some of our internal programs require you to create an account. When you do you will be prompted to create a password. You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account.

## 7. Your Rights in Relation to Your Personal Information

You can make the following choices regarding your personal information:

- **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.
- **Online Tracking.** We do not currently recognize automated browser signals regarding tracking mechanisms, which may include "Do Not Track" instructions.
- **Notification of Employment Opportunities.** You may choose to provide us with your email address for the purpose of allowing us to send you employment opportunities. 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.
- **Promotional Text Messages.** If you receive a text message from us that contains promotional information you can opt-out of receiving future text messages by replying "STOP."

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, online portal, or in person. Depending on your request, we will ask for information such as your name, your email address, your phone number, your position in the company, or the date you submitted your application to us.

In some circumstances, you may designate an authorized agent to submit requests to exercise certain privacy rights on your behalf. We will require that you verify that you provided the authorized agent permission to make a request on your behalf, as well as verify your own identity directly with us.

If you are an authorized agent, you may submit a request on behalf of an individual by calling 800-536-1390, or submitting the request [online](#).

## 8. Other Important Information

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. Our privacy policy includes an “effective” and “last updated” date. The effective date refers to the date that the current version took effect. The last updated date refers to the date that the current version was last substantively modified.
- **Accessibility.** Creative Circle 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.
- **Information for California Residents.** California law indicates that organizations should disclose whether certain categories of information are collected, “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 collect and share below on page 8-9. 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 contact [myprivacy@creativecircle.com](mailto:myprivacy@creativecircle.com).
- **Effective Date.** This policy is effective as of January 1, 2020.
- **Last Revised:** July 1, 2020

## 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). We do not “sell” your personal information. 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.** For example, while we collect the bank account information of our current employees, we do not collect the bank account information of applicants that have not yet been hired.

| Categories of Personal Information We Collect  | To Whom We Disclose Personal Information for a Business Purpose  |
|--|--|
| <p><b>Identifiers</b> – this may include real name, alias, postal address, unique personal identifier, online identifier, email address, account name, social security number, driver’s license number, passport number or other similar identifiers.</p>  | <ul style="list-style-type: none"> <li>• Affiliates or subsidiaries</li> <li>• Business partners and clients</li> <li>• Data analytics providers</li> <li>• Internet service providers</li> <li>• Operating systems and platforms</li> <li>• Payment processors and financial institutions</li> <li>• Professional services organizations, this may include auditors and law firms</li> <li>• Other Service Providers</li> <li>• Government entities, as may be required to comply with law or prevent illegal activity</li> </ul> |
| <p><b>Additional categories of personal information described in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))</b> – this may include signature, physical characteristics or description, state identification card number, insurance policy number, education, bank account number, and other financial information, medical information, and health insurance information.</p> | <ul style="list-style-type: none"> <li>• Affiliates or subsidiaries</li> <li>• Operating systems and platforms</li> <li>• Payment processors and financial institutions</li> <li>• Professional services organizations, this may include auditors and law firms</li> <li>• Other Service Providers</li> <li>• Government entities, as may be required to comply with law or prevent illegal activity</li> </ul>  |
| <p><b>Characteristics of protected classifications</b> – this may include age, sex, race, ethnicity, physical or mental handicap, etc.</p>   | <ul style="list-style-type: none"> <li>• Affiliates or subsidiaries</li> <li>• Operating systems and platforms</li> <li>• Professional services organizations, this may include auditors and law firms</li> <li>• Other Service Providers</li> <li>• Government entities, as may be required to comply with law or prevent illegal activity</li> </ul>   |
| <p><b>Internet or other electronic network activity information</b> – this may include browsing history, search history, geolocation data, and information regarding an individual’s interaction with an internet website, application, or advertisement.</p>  | <ul style="list-style-type: none"> <li>• Affiliates or subsidiaries</li> <li>• Business partners</li> <li>• Data analytics providers</li> <li>• Internet service providers</li> <li>• Operating systems and platforms</li> <li>• Professional services organizations, this may include auditors and law firms</li> <li>• Social networks</li> </ul>  |



|   |   |
|---|---|
|   | <ul style="list-style-type: none"> <li>• Other Service Providers</li> <li>• Government entities, as may be needed to comply with law or prevent illegal activity</li> </ul>   |
| <b>Audio, electronic, visual, or similar information</b>  | <ul style="list-style-type: none"> <li>• Affiliates or subsidiaries</li> <li>• Business partners</li> <li>• Data analytics providers</li> <li>• Internet service providers</li> <li>• Operating systems and platforms</li> <li>• Professional services organizations, this may include auditors and law firms</li> <li>• Other Service Providers</li> <li>• Government entities, as may be needed to comply with law or prevent illegal activity</li> </ul>             |
| <b>Professional or employment-related information</b>   | <ul style="list-style-type: none"> <li>• Affiliates or subsidiaries</li> <li>• Business partners and clients</li> <li>• Data analytics providers</li> <li>• Internet service providers</li> <li>• Operating systems and platforms</li> <li>• Professional services organizations, this may include auditors and law firms</li> <li>• Other Service Providers</li> <li>• Government entities, as may be needed to comply with law or prevent illegal activity</li> </ul> |
| <b>Non-public education information</b> (as defined in the Family Educational Rights and Privacy Act) | <ul style="list-style-type: none"> <li>• Clients</li> <li>• Internet service providers</li> <li>• Operating systems and platforms</li> <li>• Government entities, as may be needed to comply with law or prevent illegal activity</li> </ul>  |