# Introduction and Scope

This privacy notice applies to all information collected by Spherion Staffing, LLC (“Spherion,’ ‘we,“ “us,“ “our“). The privacy notice describes the personal information we collect, how we use it, and your rights regarding this information.

With this privacy notice, along with our cookie policy, we are providing information about why we collect and use your personal information, how your information is shared, retained and protected, and how you can exercise your personal choices. We will also explain how you can find out what personal information we hold about you.

This privacy notice applies to the processing of personal information we collect when you visit our websites or apps, use our services, visit our branch locations, or when you provide it to us in any other way. We also collect information from third party sources. Additional detail about our practices is provided below based on whether you are a website visitor, candidate, temporary worker or employees, prospective client or client.

# About Spherion

We provide staffing services to clients and job services to candidates seeking current or future job opportunities. We collect personal information to help connect candidates with jobs at Spherion and Spherion clients. We will process your personal information in accordance with this privacy notice (such personal information sometimes also referred to as “data”). For greater clarity, processing means any operation or set of operations which is performed on your personal information, such as collection, storage, adaptation, disclosure, restriction, deletion or destruction, among others (collectively referred to as “processing” or “process”).

Except as otherwise set out below, we are the Controller of personal information (“Controller” within the meaning of applicable data protection legislation). For greater clarity, a Controller decides why and how personal information is processed and is responsible for ensuring that all data is processed in accordance with applicable data protection legislation. As the Controller, we will, alone or jointly with others, determine the purposes and means of processing your personal data.

For the efficient operation and management of our business, we may jointly define the purposes and means of processing personal information with Spherion Group Companies (in which case the Spherion Group Companies may be defined as “joint controllers”). Examples of joint processing activities include, but are not limited to, those related to managing our Misconduct Reporting Procedure and Economic Sanctions checks. Please contact us (see the section “Contact us” below) if you want to know more and/or exercise your data protection rights regarding any jointly-controlled processing of your personal data.

# Website visitors and app users

When you visit our website or any Spherion digital platform, we collect some information related to your device, your browser and to the way you navigate our content. We may use cookies to collect this personal information.

Cookies are small text files that are saved on your device when you visit our website. Cookies enable the website to remember your actions and preferences (for example, your choice of language) and recognize you when you return, so that we may analyze trends, determine your areas of interest, and administer our website to speed up the navigation process and to make your site experience more efficient.

Please find more information on the cookies we use, for what purpose and further settings for configuring or deleting cookies in our [cookie statement](https://www.randstadusa.com/cookies/).

Personal information we collect:

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| **CATEGORIES OF PERSONAL INFORMATION SPHERION COLLECTS** | **EXAMPLES** | **HOW IS THE PERSONAL INFORMATION USED?** | **HOW IS THE PERSONAL INFORMATION COLLECTED** | **WHO DOES SPHERION**  **SHARE YOUR INFORMATION WITH** |
| Identifiers | name, e-mail address, job title, and company | * For responding to specific inquiries * To send reports or white papers you request, to subscribe you to communications, and to improve our marketing and communication strategy * Cooperating with law enforcement agencies/courts, management of legal disputes/claims, and handling any reports through Spherion's misconduct reporting procedures | * from you, if you choose to submit an inquiry or fill out a request form * If you choose to create an account or apply for a role using our websites or mobile applications, please see the “Candidate” section of this policy for additional information. | We may share your personal information:   * with other entities of the Spherion group of companies for the purposes of efficient management of business, compliance with legal and regulatory requirements and to provide our services to you and to our clients. For an overview of these entities, visit https://www.Spherion.com/find-Spherion-in-your-country/. * with our service providers * with third parties as required by law   We may also disclose your personal information to third parties in the event that we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets; or  if all or a substantial part of our assets are acquired by a third party, in which case the personal information that we hold about you may be one of the transferred assets. |
| Internet or other electronic network activity | Internet protocol (IP) address, internet service provider (ISP), browser type and device ID, operating system, device screen resolution, preferred language, date/time stamp, geographic location, the internet address from which you were linked through to our website, and/or clickstream data | * To manage the website and for system administration purposes (e.g., diagnosing technical problems, analyzing the traffic to our website) * For web analytics, in order to improve the user experience (analyzing the way our pages are visited, analyzing trends, observe and measure how our visitors engage with our website) and the quality of the content provided to you (e.g., job postings) | * automatically when you use our site or applications | * with our service providers * with third parties as required by law |

How long we keep your personal information

Spherion maintains record retention schedules to ensure that personal information is retained only as long as reasonably necessary for the fulfillment of the purposes for which such data was collected or otherwise meet valid legal or business requirements.

# Candidates

We use your personal information when providing our HR services, which include services in the field of recruitment and selection, temporary staff, secondment, payroll, personal development, career guidance, coaching, planning, and personnel and salary administration as further described in the Terms and Conditions (collectively “Services”).

Personal information we collect:

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| **CATEGORIES OF PERSONAL INFORMATION SPHERION COLLECTS** | **EXAMPLES** | **HOW IS THE PERSONAL INFORMATION USED?** | **HOW IS THE PERSONAL INFORMATION COLLECTED** | **WHO DOES SPHERION**  **SHARE YOUR INFORMATION WITH** |
| Identifiers | name, contact information (including home address, email address, home phone number and mobile phone number), citizenship and country of residence, date of birth, government issued identifiers including (without limitation) social security number, passport or driver’s license, as legally required. | * To provide our Services to you (including matching and proposing you to clients, interviews, assessments). For example, we may contact you to recommend jobs to you based on your profile and enable our consultants to provide you with tailored job opportunities, career advice, reskilling options, suggest additional training where necessary, and introduce you to hiring managers * Dispute management, litigation and handling any reports through Spherion's misconduct reporting procedure | * from you, when it is provided as part of our application process. * from you, if you choose to import from third party services like file storage sites or single sign-on services * from your current and previous employers, your references, or background check providers * From third party websites and services like job boards and professional network sites * from Spherion clients * from business intelligence sources, including data aggregators and list providers * From Spherion affiliates, which are companies that own Spherion, that are owned by Spherion, or are under common ownership with Spherion | We may share your personal information:   * with other entities of the Spherion group of companies for the purposes of efficient management of business, compliance with legal and regulatory requirements and to provide our services to you and to our clients. For an overview of these entities, visit https://www.Spherion.com/find-Spherion-in-your-country/. * with our service providers * with third parties as required by law   We may also disclose your personal information to third parties in the event that we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets; or  if all or a substantial part of our assets are acquired by a third party, in which case the personal information that we hold about you may be one of the transferred assets. |
| Internet or other electronic network activity | Internet protocol (IP) address, internet service provider (ISP), browser type and device ID, operating system, device screen resolution, preferred language, date/time stamp, geographic location, the internet address from which you were linked through to our website, and/or clickstream data | * To manage the website and for system administration purposes (e.g., diagnosing technical problems, analyzing the traffic to our website) * For web analytics, in order to improve the user experience (analyzing the way our pages are visited, analyzing trends, observe and measure how our visitors engage with our website) and the quality of the content provided to you (e.g., job postings) * Training and updating of systems/statistical purposes. Some of the systems that we use to provide our services are based on machine learning technology. In order for that technology to function reliably, it needs to be trained and updated on the basis of existing data. We may also process personal data in an aggregated manner for reporting or statistical purposes. We may share this aggregate personal data with clients, advertisers, and other third parties. This information does not identify you personally | * automatically when you use our site or applications | * with our service providers * with third parties as required by law |
| Professional or employment-related information | CV/resume, work history, information about your skills, your experience and educational background and other relevant information (such as your photograph, interview notes and personal data included in the cover letter or as part of the application process), your current compensation and benefits including (without limitation) your current bonus, recurring payments and benefits | * To provide our Services to you (including matching and proposing you to clients, interviews, assessments). For example, we may contact you to recommend jobs to you based on your profile and enable our consultants to provide you with tailored job opportunities, career advice, reskilling options, suggest additional training where necessary, and introduce you to hiring managers * Dispute management, litigation and handling any reports through Spherion's misconduct reporting procedure * Compliance with labor/employment, tax and social security laws and other legal or regulatory requirements (e.g. equal opportunity and workplace diversity requirements) | * from you, when it is provided as part of our application process. * from you, if you choose to import from third party services like file storage sites or single sign-on services * from your current and previous employers, your references, or background check providers * From third party websites and services like job boards and professional network sites * from Spherion clients * from business intelligence sources, including data aggregators and list providers * From Spherion affiliates, which are companies that own Spherion, that are owned by Spherion, or are under common ownership with Spherion | * with other entities of the Spherion group of companies for the purposes of efficient management of business, compliance with legal and regulatory requirements and to provide our services to you and to our clients. For an overview of these entities, visit https://www.Spherion.com/find-Spherion-in-your-country/. * with our service providers * with third parties as required by law |
| Geolocation Data | Information about your physical location, including your precise location if you are using a mobile application | * This information is used to display relevant job postings and site content. * We may also process in an aggregated manner for reporting or statistical purposes. | * From your device, if you choose to share it with us | * with our service providers * with third parties as required by law |
| Characteristics of protected classifications under California or federal law | Demographic information, including age, race, ancestry, national origin, religion, age, mental and physical disability, gender, or military status | * This information is only used by Spherion to meet diversity goals. We do not provide this information to hiring managers. * Dispute management, litigation and handling any reports through Spherion's misconduct reporting procedure * Compliance with labor/employment, tax and social security laws and other legal or regulatory requirements (e.g. equal opportunity and workplace diversity requirements) | * From you, if you choose to provide it when submitting a job application | * with our service providers * with third parties as required by law |
| Sensitive Personal Information as defined by CPRA | Government issued identification such as Social Security numbers or passports; precise geolocation; information about racial or ethnic origin, or union membership | * Records required for Spherion to administer direct and contract employment * Dispute management, litigation and handling any reports through Spherion's misconduct reporting procedure * Compliance with labor/employment, tax and social security laws and other legal or regulatory requirements (e.g. equal opportunity and workplace diversity requirements) | * From you, when provided as part of the application or employment process * From your device, if you choose to share your location | * with our service providers * with third parties as required by law |

If you are a candidate, we may also collect and process personal information about you in the following ways:

* Photographs and video footage – when participating in recruitment-related events, meetings, conferences, interviews, visiting a branch, etc., we may process photographs or videos of you.
* Visitor information – when accessing our buildings, we may collect your name, contact details, license plate number, and other identification for security reasons. Where we are legally required to do so we may also ask you to disclose information about your health (including information related to viral infections, flu, etc.) for health and safety reasons.

How long we keep your personal information

Spherion maintains record retention schedules to ensure that personal information is retained only as long as reasonably necessary for the fulfillment of the purposes for which such data was collected or otherwise meet valid legal or business requirements.

Temporary workers and employees

We use personal information in order to facilitate temporary assignments with our clients. We use your personal information when providing our HR services, which include services in the field of recruitment and selection, temporary staff, secondment, payroll, personal development, career guidance, coaching, planning, and personnel and salary administration as further described in the Terms and Conditions (collectively “Services”).

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| **CATEGORIES OF PERSONAL INFORMATION SPHERION COLLECTS** | **EXAMPLES** | **HOW IS THE PERSONAL INFORMATION USED?** | **HOW IS THE PERSONAL INFORMATION COLLECTED** | **WHO DOES SPHERION**  **SHARE YOUR INFORMATION WITH** |
| Identifiers | your name, contact information (including home address, email address, home phone number and mobile phone number), emergency contact information, citizenship and country of residence, date of birth, gender, digital signature, languages spoken, and government issued identifiers including (without limitation) social security number, passport or driver’s license number, as legally required. | * general HR management and administration purposes (including workforce management) * benefits administration * employee identification and access control cards may contain your name, photograph, employee number and may be linked to other details * compliance with employment/labor, tax and social security laws and other legal or regulatory requirements (e.g. equal opportunity and workplace diversity requirements) | * from you, when you apply for and/or accept employment with Spherion * from Spherion and its affiliates, which are companies that own Spherion, that are owned by Spherion, or are under common ownership with Spherion | we may share your personal information:   * with other entities of the Spherion group of companies for the purposes of efficient management of business, compliance with legal and regulatory requirements and to provide our services to you and to our clients. For an overview of these entities, visit https://www.Spherion.com/find-Spherion-in-your-country/. * with our service providers * with Spherion clients for the purpose of recruitment and provision of temporary work * with third parties as required by law   We may also disclose your personal information to third parties in the event that we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets; or  if all or a substantial part of our assets are acquired by a third party, in which case the personal information that we hold about you may be one of the transferred assets. |
| Internet or other electronic network activity | Information related to your usage of Spherion devices, software and access to Spherion’s network – we may process information related to your use of our devices, software and access to our networks, including (without limitation) your browsing history, your use of email, internet and social media, whether at the workplace, on our equipment or otherwise through our networks. We may process footage of you obtained through our use of CCTV surveillance systems on our premises. | * General HR management and administration purposes (including workforce management) * Disciplinary and grievance management, investigations, appeals (including managing complaints) and handling reports through Spherion’s misconduct reporting procedure * employee identification and access control cards may contain your name, photograph, employee number and may be linked to other details * IT support * Network and device usage optimization and related security controls (including company network access and authentication) * Audit purposes * To monitor and enforce compliance with Spherion policies and procedures | * automatically when you use Spherion devices and software or access Spherion’s network | * with our service providers * with third parties as required by law |
| Professional or employment-related information | Personal Information related to your work including (without limitation) your job title, description and location, your department, professional email address, reporting levels, employment status, performance-related information including (without limitation) information on your performance reviews, salary information including (without limitation) recurring payments and benefits, any bonus or other compensation, your CV/resume and other relevant information (such as your photograph, interview notes and information included in the cover letter or as part of the application process), grievance information, disciplinary information, information about your personal or company car, employee survey responses, trade union membership, information related to your family and dependents, employment-related travel and expense data, health-related information including (without limitation) injuries and exposure, incident reports, disability, sickness and absences and maternity leave information, as legally required. | * general HR management and administration purposes (including workforce management * dispute management, litigation and handling any reports through Spherion's misconduct reporting procedure * compliance with labor/employment, tax and social security laws and other legal or regulatory requirements (e.g. equal opportunity and workplace diversity requirements) * performance management, career development and training * benefits administration * health and safety purposes | * from you, when you apply for and/or accept employment with Spherion * from Spherion and its affiliates, which are companies that own Spherion, that are owned by Spherion, or are under common ownership with Spherion * from Spherion clients | * with other entities of the Spherion group of companies for the purposes of efficient management of business, compliance with legal and regulatory requirements and to provide our services to you and to our clients. For an overview of these entities, visit https://www.Spherion.com/find-Spherion-in-your-country/. * with our service providers * with third parties as required by law * with Spherion clients for the purpose of recruitment and provision of temporary work * with third parties providers of marketing-related services (e.g., software, databases, list providers and aggregators, event organization) |
| Financial Information | bank account information, payment information, corporate card information | * Compensation, payroll and expense reimbursement (including reporting and billing to clients) * Insurance, pension and other benefits | * From you, when you provide it for payroll or expense purposes * From a corporate card provider | * with our service providers * with third parties as required by law |
| Geolocation Data | Information about your physical location, including your precise physical location, when using Spherion-owned device or using a personal device for work purposes | * For timekeeping purposes * Fleet management * Preventing, detecting, and investigating fraud | * From your device, if you choose to share it with us * From a Spherion-owned device you are using | * with our service providers * with third parties as required by law * with Spherion clients for the purpose of provision of temporary work |
| Characteristics of protected classifications under California or federal law | Demographic information, including age, race, ancestry, national origin, religion, age, mental and physical disability, gender, or military status | * General HR management and administration purposes (including workforce management) * Compliance with employment/labor, tax and social security laws and other legal or regulatory requirements (e.g. equal opportunity and workplace diversity requirements Dispute management, litigation and handling any reports through Spherion's misconduct reporting procedure * Compliance with labor/employment, tax and social security laws and other legal or regulatory requirements (e.g. equal opportunity and workplace diversity requirements) | * from you when you apply for and/or accept employment with Spherion | * with our service providers * with third parties as required by law |
| Biometric Information | Biometric data, such as your fingerprint or facial appearance | * Timekeeping purposes | * From you, if you work in a location that uses biometrics for timekeeping purposes | * with our service providers * with third parties as required by law * with Spherion clients for the provision of temporary work |
| Sensitive Personal Information as defined by CPRA | Government issued identification such as Social Security numbers or passports; account login credentials allowing access to the account; precise geolocation; information about racial or ethnic origin, religious beliefs, philosophical beliefs, or union membership; contents of consumers’ mail, emails, or text messages, unless the business is the intended recipient; genetic data; information concerning a consumer’s health, sex life, or sexual orientation; and biometric information used for the purpose of uniquely identifying a consumer | * General HR management and administration purposes (including workforce management * Dispute management, litigation and handling any reports through Spherion's misconduct reporting procedure * Compliance with labor/employment, tax and social security laws and other legal or regulatory requirements (e.g. equal opportunity and workplace diversity requirements) | * From you, when provided as part of the application or employment process * From your device, if you choose to share your location | * with our service providers * with third parties as required by law * with Spherion clients for the purpose of recruitment and provision of temporary work |

How long we keep your personal information

Spherion maintains record retention schedules to ensure that personal information is retained only as long as reasonably necessary for the fulfillment of the purposes for which such data was collected or otherwise meet valid legal or business requirements.

# Business relations

We process your personal information if you are working for companies with which we are conducting (or intending to conduct) business (e.g., to negotiate agreements and to maintain a business relationship with the company you work for).

Personal information we collect

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| **CATEGORIES OF PERSONAL INFORMATION SPHERION COLLECTS** | **EXAMPLES** | **HOW IS THE PERSONAL INFORMATION USED?** | **HOW IS THE PERSONAL INFORMATION COLLECTED** | **WHO DOES SPHERION**  **SHARE YOUR INFORMATION WITH** |
| Identifiers | name and other contact information (including email address, landline phone number and mobile phone number), digital signature and languages spoken | * To administer and manage the contractual relationship between Spherion and our clients and service providers * Business development (including sending direct marketing and offers) * Surveys (including satisfaction surveys) | * From you, if you provide it to us or enter into a business relationship with us * from our affiliates, which are companies that own Spherion, that are owned by Spherion, or are under common ownership with Spherion * From third party websites and services * from business intelligence sources, including data aggregators and list providers | We may share your personal information:   * with other entities of the Spherion group of companies for the purposes of efficient management of business, compliance with legal and regulatory requirements and to provide our services to you and to our clients. For an overview of these entities, visit https://www.Spherion.com/find-Spherion-in-your-country/. * with our service providers * with third parties as required by law   We may also disclose your personal information to third parties in the event that we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets; or  if all or a substantial part of our assets are acquired by a third party, in which case the personal information that we hold about you may be one of the transferred assets. |
| Professional or employment-related information | information related to your work including (without limitation) your job title, your location and your department | * To administer and manage the contractual relationship between Spherion and our clients and service providers * Business development (including sending direct marketing and offers) | * From you, if you provide it to us or enter into a business relationship with us * from our affiliates, which are companies that own Spherion, that are owned by Spherion, or are under common ownership with Spherion * From third party websites and services   from business intelligence sources, including data aggregators and list providers | * with our service providers * with third parties as required by law   We may share your personal information:   * with other entities of the Spherion group of companies for the purposes of efficient management of business, compliance with legal and regulatory requirements and to provide our services to you and to our clients. For an overview of these entities, visit https://www.Spherion.com/find-Spherion-in-your-country/. * with our service providers * with third parties as required by law   We may also disclose your personal information to third parties in the event that we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets; or if all or a substantial part of our assets are acquired by a third party, in which case the personal information that we hold about you may be one of the transferred assets. |
| Business records | Company name, company contact(s) name and contact information, business financial records, confidential business information | * engage in business relationships with Spherion customers and vendors | * From you, if you provide it to us or enter into a business relationship with us | * with third parties as required by law * with our service providers |

We process the following personal information about you:

* Photographs and video footage – when participating in our events, meetings, conferences etc., we may process photographs or videos of you.
* Visitor information – when accessing our buildings, we may collect your name, contact details, car plate number, identification, etc. for security reasons. Where we are legally permitted to do so we may also ask you to disclose information about your health (including information related to viral infections, flu, etc.) for health and safety reasons.
* Information you choose to share with us – we may process additional information if you choose to share that with us.
* Trade sanctions information relating to you - we may verify whether you are a politically exposed person, a specially designated national or otherwise subject to sanctions under applicable laws or regulations.

How long we keep your personal information

We maintain record retention schedules to ensure that personal information is retained only as long as reasonably necessary for the fulfillment of the purposes for which such data was collected or otherwise meet valid legal or business requirements.

1. HR technologies

Talent matching and services for candidates

We use innovative HR technologies that help us digitize and enhance a variety of recruitment-related processes. Some of these technologies use artificial intelligence (AI) or machine learning techniques.

For example, we use chatbots to improve your candidate experience. Chatbots give you the opportunity to answer questions based on the requirements of the job you apply for. This is a user-friendly way to:

* provide us with relevant information that may not be readily apparent from your application, profile or resume.
* know promptly whether your skills meet a job’s essential requirements and, if not, to easily explore other jobs or to identify gaps in their skillset.
* answer at any moment convenient to the user.

As part of the larger recruitment process, HR technologies allow us to connect candidates more quickly to our consultants. This, in turn, allows our consultants to better support candidates in exploring jobs and to deliver the right candidates more quickly to our clients. HR technologies also allow our consultants to find people based not only on the jobs they qualify for but also on the basis of jobs they are interested in.

Improving the client experience

HR technologies help us to search through a broader and more diverse set of candidates so that we become even better at finding the best talent with the most relevant skill-set for our clients.

Web beacons

Our emails may contain a single, campaign-unique "web beacon pixel" to tell us whether our emails are opened and verify any clicks through to links or advertisements within the email. We may use this information for purposes including determining which of our emails are more interesting to users, to query whether users who do not open our emails, wish to continue receiving them and to inform our advertisers in aggregate how many users have clicked on their advertisements. The pixel will be deleted when you delete the email. If you do not wish the pixel to be downloaded to your device, you should select to receive emails from us in plain text rather than HTML.

Responsible use of HR technologies

Spherion is committed to the ethical and responsible use of innovative HR technologies (you can read our AI principles here).

We strive to involve human beings whenever we make decisions that significantly impact you. If, in exceptional cases, we were to make such decisions based on a fully automated process (ie. without involvement of humans), we will only do so where that is permitted by law and after having notified you.

To ensure all candidates are treated fairly we take steps to avoid bias where we use HR technologies. For example:

* We regularly test the output created by these technologies to identify potential bias.
* We regularly obtain expert advice to continuously improve the way in which we identify and remove bias.
* Both our consultants and our search and match algorithms are thoroughly trained and always work together.

# Where we share your personal information

When we share your personal information as described above, such personal information may be transferred outside of the United States. In that event, we will only do so in line with applicable law, and we will require that there is an adequate level of protection for your personal data, and that appropriate security measures are in place. Spherion does not sell health information as defined by the Washington My Health My Data Law.

# How we will protect your personal information

We have technical and organizational security measures in place to protect your personal information from being accidentally lost, used, altered, destructed, disclosed or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your personal information are governed by Spherion's rules for information and IT security, data protection and other internal policies and guidelines.

While we have measures in place to protect your personal information, it is important for you to understand that 100% security cannot be guaranteed. Accordingly, we have procedures in place to deal with data security incidents and to comply with legal requirements applicable to the detection, handling and notification of personal information breaches.

# Your personal information protection rights

You have the following rights regarding your personal information:

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| **Type of Right** | **Description** | **How to Exercise** |
| Right to Request Access to Personal Information/Right to Know | You may ask us to furnish you with:   * The categories or specific pieces of personal information that Spherion has collected about you * the categories of sources where Spherion obtained personal information about you * the business purposes for which Spherion collects your personal information * the categories of third parties with which Spherion shares personal information   You may submit a Personal Data Request to obtain a copy of personal information Spherion has about you. | You can submit two such access requests every 12 months here: [Privacy Request Form](https://www.spherion.com/privacy-request/)  Before we grant you access to or deletion of your personal information, we must verify your identity. To do this, we will ask you to confirm information we have previously collected about you. If we ask you to verify your identity, and you do not promptly cooperate, we may be unable to fulfill your request.  We will make commercially reasonable efforts to fulfill your request within 45 days; however, if we need more time, we may extend the time frame 45 days and notify you. |
| Right to Request Deletion | You have the right to request that Spherion delete any of your personal information that Spherion has collected from you, with certain exceptions. We may refuse your request if we are required by law to keep the information, or if the law otherwise permits us to keep information. If we deny a request, we will tell you why the request was denied. Where required, we will instruct any service providers or third parties to delete your information. | You can submit your request here: [Privacy Request Form](https://www.spherion.com/privacy-request/)    Before we grant you access to or deletion of your personal information, we must verify your identity. To do this, we will ask you to confirm information we have previously collected about you. If we ask you to verify your identity, and you do not promptly cooperate, we may be unable to fulfill your request.  We will make commercially reasonable efforts to fulfill your request within 45 days; however, if we need more time, we may extend the time frame 45 days and notify you. |
| Right to Correct Personal Information | In certain circumstances, you have the right to request correction of any inaccurate personal information. | You can submit your request here: [Privacy Request Form](https://www.spherion.com/privacy-request/)    Before we grant you access to or deletion of your personal information, we must verify your identity. To do this, we will ask you to confirm information we have previously collected about you. If we ask you to verify your identity, and you do not promptly cooperate, we may be unable to fulfill your request.  We will make commercially reasonable efforts to fulfill your request within 45 days; however, if we need more time, we may extend the time frame 45 days and notify you. |
| Do Not Sell/Share Personal Information | You may have the right to direct Spherion not to sell your personal information to third parties. | There is no ID verification required. |
| Right to Non-Discrimination | You have the right not to receive discriminatory treatment for exercising any of your rights. | No action needed |

# Children’s privacy

Spherion’s services are only available to individuals over the age of 18. Spherion is not intended for and does not knowingly collect personal information from individuals under 18. If we believe you are under 18, we may delete your information at any time without notice to you. If you are the parent or guardian of a child under the age of 13 and believe that your child has provided personal information to us, you may use the “contact us” information below to exercise your rights as a parent or guardian.

# Changes to this privacy notice

We may update this notice from time to time. You can see the date on which the last change was made below in this notice. If we make any material changes, we will notify you by email (using the email address specified in your account) where required, or by a notice on this website. We advise you to review this notice regularly so that you are aware of any changes. By engaging with us after this privacy policy has been updated, you agree to the updated terms.

# Contact us

If you have any questions about this policy or any privacy concerns, or would like to exercise your rights, please contact us at <https://www.spherion.com/privacy-request/> or:

Privacy Office

Randstad North America, Inc.

One Overton Park

3625 Cumberland Blvd SE

Atlanta, GA 30339

Last updated: November 2024