

# Privacy Notice

This privacy notice provides a framework of understanding about the personal data that are collected by SAS Manpower Lit filiāle Manpower Lit (“hereinafter called the Data Controller”), as required by law including the provisions of the European Union’s General Data Protection Regulation (GDPR).

## Data Controller

The Data Controller is SAS Manpower Lit filiāle Manpower Lit with the registered office in 33-17 Krišjāņa Valdemāra street, Riga, LV-1010, Latvia.

The personal data collected will be controlled and processed by the Data Controller. Additionally, personal data may be processed or jointly controlled by affiliates of the Data Controller.

This privacy notice applies to (1) our job candidates and recipients of our career services, (2) our employees that are employed by us, (3) users of our websites and apps (the "Sites"), and (4) representatives of our business partners, clients and vendors.

The privacy notice describes the types of personal data or personal information we collect, how we use the information, how we process and protect the information we collect, for how long we store it, with whom we share it, to whom we transfer it and the rights that individuals can exercise regarding our use of their personal data. We also describe how you can contact us about our privacy practices and to exercise your rights.

Our privacy practices may vary among the countries in which we operate to reflect local practices and legal requirements. You can view specific local terms by going to local websites.

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## Information We Collect

We may collect personal data about you in variety of ways, such as through our Sites and social media channels; at our events; through phone and fax; through job applications; in connection with in-person recruitment; or in connection with our interactions with clients

and vendors. We may collect a selection of personal data depending on the nature of the relationship, including, but not limited to (as permitted under local law):

- contact information (such as name, postal address, email address and telephone number);
- username and password when you register on our Sites;
- information you provide about friends or other people you would like us to contact. (The Controller assumes that the other person previously gave an authorization for such communication); and
- other information you may provide to us, such as in surveys or
- through the "Contact Us" feature on our Sites.

If you are a job candidate and you apply for a position or create an account to apply for a position, we may collect the following types of personal data (as permitted under local law):

- employment and education history;
- language proficiencies and other work-related skills;
- citizenship and work authorization status;
- information provided by references; and
- information contained in your resume or C.V., information you provide regarding your career interests, and other information about your qualifications for employment.

and

where required by law explicit consent has been provided by you:

- disabilities and health-related information;
- criminal and other background checks.

If you are entering employment relationships with us or you are already our employee, we may collect the following types of personal data (as permitted under local law):

- Personal ID number or Social Security number, national identifier or other government-issued identification number;
- citizenship and work authorization status;
- date of birth;
- gender;
- education;
- bank account information;
- tax benefits information;

and

where required by law explicit consent has been provided by you:

- disabilities and health-related information;
- criminal and other background checks

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

## How We Use the Information We Collect

The Data Controller collects and uses the data gathered for the following purposes (as permitted under local law):

- a) providing workforce solutions and connecting people to work;
- b) creating and managing online accounts;
- c) processing payments;
- d) managing our client and vendor relationships;
- e) where permitted under law and with your consent and consistent with the Data Controller's Cookie and Advertising Notice (which is available here - <http://manpower.lv/en/cookie-policy>) to send information regarding available positions, promotional materials and other communications;
- f) where permitted under law and with your consent to communicating about, and administering participation in, special events, promotions, surveys, contests and market research;
- g) responding to individuals' inquiries and claims;
- h) operating, evaluating and improving our business (including developing, enhancing, analyzing and improving our services; managing our communications; performing data analytics; and performing accounting, auditing and other internal functions);
- i) protecting against, identifying and seeking to prevent fraud and other unlawful activity, claims and other liabilities; and
- j) complying with and enforcing applicable legal requirements, relevant industry standards, contractual obligations and our policies.

In addition to the activities listed above, if you are an employee or job candidate and you apply for a position or create an account to apply for a position, as permitted under local law, we use the information described in this privacy notice for the following purposes:

- a) providing you with job opportunities and work;
- b) establishing employment relationships with you and fulfil contractual obligations (for instance, time sheets, payroll and tax calculation etc.);
- c) providing additional services to you, such as training, career counselling and career transition services;
- d) assessing your suitability as a job candidate and your qualifications for positions; and
- e) performing data analytics, such as (i) analyzing our job candidate and employees base; (ii) assessing individual performance and capabilities, including scoring on work-related skills; (iii) identifying skill shortages, and (v) analyzing trends regarding hiring practices.

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

If you do not provide certain information to us, we may not be able to accomplish the purposes outlined in this notice.

All data processing will be carried out based on adequate legal grounds which may fall into a number of categories, including:

- a) consent or an explicit consent from the data subject, where required by applicable law;
- b) to ensure that we comply with a statutory or contractual requirement, or a requirement necessary to enter into a contract [e.g. processing your personal data to ensure that your wages and taxes are paid].
- c) it is essential and necessary for the legitimate interest of the Data Controller [e.g. letting the user access the website to be provided with the services offered].

## Examples of Legitimate Interest

The Data Controller may process personal data for certain legitimate business purposes, which includes some of all of the following:

- where the process enables us to enhance, modify, personalize or otherwise improve our services/communications for the benefit of our clients, candidates and employees;
- to identify and prevent fraud;
- to enhance security of our network and information systems;
- to better understand how people, interact with our websites.

Whenever we process data for these purposes we will ensure that we keep your rights in high regard and take account of these rights. You have the right to object to such processing, and if you wish to do so please contact us. Please bear in mind that if you exercise your right to object this may affect our ability to carry out and deliver services to you for your benefit.

## How We Process and Protect Personal Information

We process the personal data we collect, also by automated means, for the purposes defined above and for a specific period of time, which complies with our internal retention policy, in order to ensure that the personal data are not kept longer than necessary.

We maintain administrative, technical and physical safeguards designed to protect the personal data you provide against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. In order to ensure the appropriate security and confidentiality of the personal data, we apply to the following security measures:

- Encryption of data in transit;
- Strong user authentication controls;
- Hardened network infrastructure;
- Network monitoring solutions.

## How Long We Store the Data We Collect

We store in our systems the personal data we collect in a way that allows the identification of the data subjects for no longer than it is necessary in light of the purposes for which the data was collected, or for which that data is further processed.

We determine this specific period of time by taking into account:

- The necessity to keep stored the personal data collected in order to offer services established with the user;
- In order to safeguard a legitimate interest of the Data Controller as described in the purposes;
- The existence of specific legal obligations that make the processing and related storage necessary for specific period of times.

## Information We Share

We do not disclose personal data that we collect about you, except as described in this privacy notice or in separate notices provided in connection with particular activities. We may share personal data 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 data (i) with our subsidiaries and affiliates; (ii) if you are a job candidate, with clients who may have job opportunities available or interest in placing our job candidates; (iii) if you are our employee, with clients you have been assigned to work for, and (iv) with others with whom we work, such as job placement consultants and subcontractors, to find you a job.

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

## Data Transfers

We also may transfer the personal data 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 personal data. When we transfer your information to other countries, we will protect that data as described in this privacy notice and such transfers will be in compliance with applicable law.

The countries to which we may transfer the personal data we collect about you may be:

- Within the European Union
- Outside the European Union

When we transfer personal data from within the European Union to countries or international organizations that are based outside the European Union the transfer takes place on the basis of:

- a) Adequacy decision by the European Commission;
- b) In absence of an adequacy decision other legally permitted grounds (a) legally binding and enforceable instrument between public authorities or bodies; (b) binding corporate rules; (c) standard data protection clauses (formerly called the Model Clauses) adopted by the Commission, etc. Please contact us to obtain more information and copies of documents.

## Your Rights as Data Subject

When required by applicable law, a data subject can exercise under Articles 15 to 22 of the GDPR the following specific rights:

- a) *Right of access*: A data subject has the right to access his or her personal data concerning which in order to verify that his or her personal data is processed in accordance to the law.
- b) *Right to rectification*: A data subject has the right to request the rectification of any inaccurate or incomplete data held about him or her, in order to protect the accuracy of such information and to adapt it to the data processing.
- c) *Right to erasure*: A data subject has the right to request that the Data Controller erases information about him or her and to no longer process that data.
- d) *Right to restriction of processing*: A data subject has the right to request that the Data Controller restricts the processing of his or her data.
- e) *Right to data portability*: The data subject has the right to request the data portability meaning that the data subject can receive the originally provided personal data in a structured and commonly used format or that the data subject can request the transfer of the data to another Data Controller.
- f) *Right to object*: The data subject who provide a Data Controller with personal data has the right to object, at any time to the data processing on a number of grounds as set out under GDPR without needing to justify his or her decision.
- g) *Right not to be subject of automated individual decision-making*: The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, if such profiling produces a legal effect concerning the data subject or similarly significantly affects him or her.
- h) *Right to lodge a complaint with a supervisory authority*: Every data subject has the right to lodge a complaint with a supervisory authority, in particular in the EU Member State of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes GDPR.

Whenever the processing is based on the consent, as under art.7 of the GDPR, the data subject may withdraw their consent at any time.

If you require more information about the processing of your personal data, please refer to the How to Contact Us section below.

## Updates to Our Privacy Notice

This privacy notice (including any addenda) may be updated periodically to reflect changes in our privacy practices and legal updates. For significant changes, we will notify you by posting a prominent notice on our Sites indicating at the top of each Notice when it was most recently updated.

## How to Contact Us

If you have any questions about this Privacy notice, or if you would like to exercise your rights of Data Subject, please write to:

SAS Manpower Lit filiāle Manpower Lit

33-17 Krišjāņa Valdemāra street, Riga, LV-1010

Email: [dataprivacy@manpower.lv](mailto:dataprivacy@manpower.lv)