

## ONLINE TERMS OF USE & PRIVACY INFORMATION

Latest update: June 2023

The data privacy regulations of some countries require that a person making a report (“Reporter”) containing personal data must be notified of certain collection and retention practices regarding the information submitted by that person through this service. The Reporter can remain anonymous when providing the information.

### 1. General

The Adecco Compliance and Ethics Line (“ACE Line”) is a web and phone-based intake system provided by Adecco Group AG, with registered address at Bellerivestrasse 30, 8008 Zürich, Switzerland (“Adecco Group”), open to its colleagues, associates, candidates and clients, providers and other third parties (“Reporters”) for reporting suspected violations of laws or regulations, or for certain matters specifically specified in an applicable whistleblowing law.

Adecco Group is the controller of the processing, and NAVEX Global UK Limited, (company registration number 12011655 and business address at 1 Queen Caroline Street, London W6 9NY; [privacy@navexglobal.com](mailto:privacy@navexglobal.com)) is a processor acting on behalf of Adecco Group.

You may contact Adecco Group with any questions relating to this service or to this Privacy Information Statement as follows:

#### About the service:

Group Compliance Reporting Office  
Bellerivestrasse 30  
8008 Zürich - Switzerland  
[compliance@adecgroup.com](mailto:compliance@adecgroup.com)

#### About the Privacy Information Statement:

You can contact Adecco Group’s Privacy Officer at the following address: [globalprivacy@adecgroup.com](mailto:globalprivacy@adecgroup.com)

In certain countries, such as the United States, the ACE Line may also be used to report suspected violations of other matters.

The ACE Line and the database in which the personal data and information that you may report is stored, are operated in an EU-based data center (Germany and The Netherlands) and EU-based contact center (Portugal) by NAVEX Global UK.

### 2. Use of the ACE Line

Use of the ACE Line is entirely voluntary. You are encouraged to report possible violations directly to your supervisor or local management or a representative of the Human Resources, Legal or Group Compliance Reporting Office, Group Internal Audit or Group Function Integrity & Compliance, or to a member of the Board of Directors of Adecco Group AG, depending on the nature of the alleged misconduct. If you feel that you are unable to do so, you may use the ACE Line to make your report.

The ACE Line is a confidential online reporting system that allows you to report suspected violations of law or company policies, as well as other concerns you may have, to Adecco Group. In certain countries, Adecco Group may only accept reports through the ACE Line that relate to certain matters specified in an applicable whistleblowing law. If your concern pertains to a matter that, under local law, may not be accepted by Adecco Group through the ACE Line, you will need to contact your supervisor or local management or a representative of the Human Resources, Legal or Group Compliance Reporting Office, Group Internal Audit or Group Function Integrity & Compliance to report the matter or a member of the Board of Directors of Adecco Group AG.

Please be aware that the information you supply about yourself, your colleagues, or any aspect of the company's operations may result in decisions that affect others. Therefore, we ask that you only provide information that you believe is true. You will not be subject to retaliation from Adecco Group or its affiliates or subsidiaries for any report of an alleged misconduct that is made in good faith, even if it later turns out to be factually incorrect. Please be aware that knowingly providing false or misleading information will not be tolerated. The information you submit will be treated confidentially except in cases where this is not possible because of legal requirements or in order to conduct an investigation, in which case the information will be handled sensitively. We encourage you to identify yourself in order for Adecco Group to follow up with questions arising from your report.

### **3. No warranties, Limitation of Liability**

To the extent permitted by applicable laws, due to ACE Line being a confidential online reporting system powered by a third party (NAVEX Global UK), Adecco does not warrant or represent that the tool, the servers and/or the content (the "system") is accurate, complete, error-free, free of viruses or other harmful components or reliable or that the use of the system will not infringe rights of third parties. Use of the system is at your risk, and everything on the system is provided to you "AS IS" AND "AS AVAILABLE" WITHOUT WARRANTY OF ANY KIND, EITHER EXPRESSED OR IMPLIED. To the extent permitted by applicable law, Adecco Group will not be liable for any loss arising out of or in connection with the use of the system, whether direct or indirect, incidental, consequential or otherwise.

### **4. What personal data and information is collected and processed?**

The ACE Line captures the following personal data and information that you provide when you make a report: (i) your name and contact details (unless you report anonymously) and whether you are employed by Adecco Group or its affiliates or subsidiaries; (ii) the name and other personal data of the persons you name in your report if you provide such information (i.e.: description of functions and contact details); (iii) a description of the alleged misconduct as well as a description of the circumstances of the incident and (iv) any further information you

enter in the system. Note that depending upon the laws of the country in which you are residing, the report may not be made anonymously; however, your personal information will be treated confidentially and will only be disclosed as set out below.

During the reporting process, a Reporter may choose to provide certain categories of sensitive information voluntarily. In each case, Adecco Group will collect the information provided and handle the data in accordance with the practices as set out in this Privacy Information Statement.

**5. How will the personal data and information be processed after your report and who may access personal data and information?**

The purpose for which your personal data and your report will be used will be to investigate the issues raised in your report and to take appropriate follow-up action, in accordance with applicable law.

The personal data and information you provide will be stored in a database which is located on servers hosted and operated in the European Union by NAVEX Global UK. Adecco Group has entered into contractual commitments with NAVEX Global UK to secure the information you provide in accordance with applicable law under which commitments NAVEX Global UK is obliged to maintaining stringent privacy and security practices including those related to notice, choice, onward transfer, security, data integrity, access, and enforcement.

You may contact Adecco Group with any requests relating to the use, transfer, correction, or deletion of any of your personal data stored by this service at:  
[globalprivacy@adeccogroup.com](mailto:globalprivacy@adeccogroup.com)

For the purpose of processing and investigating your report and subject to the provisions of local law, the personal data and information you provide may be accessed, processed and used by the relevant personnel of Adecco Group or its affiliates or subsidiaries, including Human Resources, Finance, Internal Audit, Legal, Integrity & Compliance, management, external advisors (e.g. legal advisors), or, in limited circumstances, by technical staff at NAVEX Global UK. Those individuals may be located in Switzerland, , the United Kingdom, Portugal, the United States or elsewhere.

Personal data and information you provide may also be disclosed to the police and/or other enforcement, regulatory or governmental authorities. The relevant bodies that receive and process personal data can be located in different jurisdictions depending on where the investigations take place. This may occur even in another country that may not provide the level of data protection available in the EU or Switzerland.

Adecco Group does not take any solely automated decisions including those based on profiling, that have a legal or similarly significant effect on you.

Personal data collected will never be used for any marketing purpose.

**6. Accessing information concerning the report**

Adecco Group endeavours to inform the persons involved on the way their personal data will be processed as soon as practically possible. The personal information in a whistleblowing report can relate to the Reporter, the subject of the report, witnesses or other individuals that are mentioned.

However, it is possible that informing the subject of the report at an early stage may jeopardise the investigation. In these cases, the sharing of specific information with the subject of the report might need to be deferred. Deferral of information is usually decided on a case by case basis and the reasons for any restriction documented.

## **7. Legal Basis for Processing**

Adecco Group is committed to respect the lawfulness of processing based on two legal grounds relevant in this context:

- The processing of personal data is necessary for compliance with a legal obligation (Article 6.1(c) of the EU General Data Protection Regulation [GDPR]).
- Processing of personal data that cannot be justified by the requirement to comply with legal obligations is still possible when considered necessary by Adecco Group to pursue Adecco Group's legitimate interests provided that there is a balance between these interests and individuals' rights affected by the reporting. (Article 6.1(f) of the GDPR).

To the extent that the processing is likely to involve special categories of personal data as defined in Article 9 of the GDPR, Adecco Group is obliged to ensure that the processing of such data is legally permitted.

## **8. Data Security**

Although Adecco Group will do its best to protect your personal information, you should be aware that the transmission of information via the Internet is not completely secure and Adecco Group cannot guarantee the security of your personal information transmitted to the system or any third party; for this reason, any transmission is at your own risk. Adecco Group will use adequate operational procedures, technical and organizational security measures to prevent any unauthorized access, change, deletion or transmission of your Personal Data.

## **9. Retention of the Report and of Your Personal Data**

Adecco Group has in place a data retention scheme for personal data stored in the Adecco Group's Compliance Reporting database.

The length of time personal information is retained in the Adecco Group's Compliance Reporting database after closing of a case (retention time) takes into account the severity of the case as such, whether an investigation has been conducted, whether an alleged wrongdoing of individuals has been substantiated and whether remedial measures regarding organization or processes or against individuals have been decided/taken.

The retention time depends on the data protection and privacy rights involved/affected by the respective case, on the legal obligations of the Company to retain certain information, and on the interest of the Company to maintain information about closed cases of misconduct.

The retention time applied after a case is closed can be up to 10 years (for substantiated severe cases under criminal law) and in cases of damages due to injury or death up to 20 years, in application of the Swiss Criminal Code.

## 10. Your Rights

Adecco Group will fully support you in exercising of any rights you may have as a data subject under applicable law, i.e., your:

- right of access to your data;
- right to rectification of incorrect data;
- right to erasure e-data and “*right to be forgotten*”;
- right to ask for restriction or to object to processing; and
- right to data portability.

Adecco Group will only restrict any of the above rights if and to the extent that this is necessary and proportionate in order to safeguard any of the major public interests recognized in applicable law such as the protection of criminal investigations or public security, or to protect the fundamental rights and freedoms of others, including any person(s) incriminated in your report or Adecco Group’s legitimate interest, in accordance with applicable law.

In addition to the rights listed above, you may also have the right to lodge a complaint about Adecco Group’s processing of your personal data with the authority competent for supervising the processing of personal data (often referred to as the data protection authority) in the country where you live (if that is an EU/EEA Member State) or in the country Adecco Group is based (if you live outside the EU/EEA).

To exercise your rights, you can contact Adecco Group; please visit our privacy management platform [here](#).

## 11. Transfers of Personal Data

Your report and your details may be held on the secure servers of NAVEX Global UK located in the European Union (Germany, The Netherlands and Portugal) ; may be transferred to NAVEX Global UK sub-processors outside the European Union for service and support or translation and interpretation purposes; and may be passed on to the servers of Adecco Group in Switzerland or in any other jurisdiction subject to appropriate safeguards.

## 12. Special Country Regulations

Throughout certain member states of the European Union and surrounding areas, reports may be limited in topics pursuant to applicable law. Further, some countries restrict reports such that only employees in key or management functions may be the subject of a report.

Any issues or concerns relating to topics not permitted by law to be reported via the ACE Line should be reported directly to your supervisor or local management or a representative of the Human Resources, Legal or Group Compliance Reporting Office, Group Internal Audit or Group Function Integrity & Compliance or to a member of the Board of Director of Adecco Group AG as appropriate for the subject matter of the possible violation. In some countries, anonymous reports may not be permitted under the law except under extremely restrictive circumstances.

### 13. IP addresses and cookies

In addition to the above, other information, such as IP address, may be automatically collected from Reporters using ACE Line. This automatically collected information may be used to protect and secure the integrity of the system and data hosted, and may be shared with law enforcement authorities to enforce our rights or as otherwise required by applicable law.

ACE Line uses only strictly necessary cookies for the site to be able to provide its intended basic function (i.e. report intake). Accordingly, there is no option for the individual to block these cookies as the site would not work without them.

No personally identifiable information is collected or processed through these cookies.

Below you can find more information about the cookies used.

Domain	Name	Type	Purpose	Lifespan
secure.ethicspoint.com	ASPSESSIONIDASVABCTA	First party	Session state enables you to store and retrieve values for a user as the user navigates pages in a web application.	Session and 30-minutes since last access by user for given session
secure.ethicspoint.com	NGSecure	First party	Created and used by the firewall / load balancer for session persistence	Session and 30-minutes since last access by user for given session
secure.ethicspoint.com	Ep	First party	Stores variables related to report dispatch and intake method for NAVEX Global UK contact center intake method	Session and 30-minutes since last access by user for given session

### 14. Changes to this Policy

The terms of this Policy may change from time to time. Adecco Group shall publish any material changes to this Policy through appropriate notices either on this website or by contacting users through other communications channels.

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