



Privacy Policy

8/29/2017





The purpose of this Privacy Statement is to explain what ExecuPOWER, Inc. (EP) EP does with personally identifiable information that you provide to us, such as your name, mailing address or email address. We want you to know how your personally identifiable information will be protected, who we may share it with, and for what purposes.

INFORMATION COLLECTED

This applies to all personal data or information collected by EP. Personal information collected by EP is often limited to e-mail address, language, country or location, but may include other information as needed to provide a requested service or where an employment opportunity is being considered or offered. We may collect information such as, but not limited to:

- Your name, contact information (e.g., address, email address, telephone number), resume/CV, ZIP/postal code, occupation, and career history.
- Your age, gender, race or ethnicity, if provided and permitted by local law.
- Examples of other types of information that we may collect include:
 - Education, occupation, skills and experience, awards, memberships and affiliations, activities and interests.
 - Your connections from third party applications.
 - Third parties, such as references or contacts that you provide to us.

EP takes reasonable steps to ensure that personal data collected is accurate, complete, and current and utilized for its intended use. EP limits the collection and processing of personal information only to what is necessary to fulfill the intended purpose.

SENSITIVE PERSONAL DATA

Sensitive personal data is defined in the Data Protection Acts as any personal data as to:

- (a) racial or ethnic origin, political opinions, religious or philosophical beliefs;
- (b) trade union membership;
- (c) physical or mental health condition or medical data obtained, as a result of employment drug screen results;
- (d) criminal proceedings or sentence of any court in such proceedings;
- (e) any proceedings for an offence committed or alleged to have been committed by the data subject, the disposal of such proceedings or the sentence of any court in such proceedings.





EP may process this type of data for the purposes of equal opportunities monitoring, or if it is prescribed by law, or it is needed for the protection of life, health or freedom, or if it is required for the performance of your employment contract, subject to appropriate security safeguards and local legal requirements.

EXCEPTIONS

Except as described herein, we will not otherwise use or disclose any of your personal information, except to the extent reasonably necessary to:

- correct technical errors and to technically process your personal information;
- protect the security and integrity of EP;
- protect any EP property or rights or obligations and/or the property, rights or obligations of third parties where EP may have an obligation or liability in respect of these;
- take precautions against potential liability on the part of EP;
- any extent required by law, applicable regulation or judicial process;
- any extent permitted under any other applicable legal or regulatory provisions to provide information to law enforcement agencies or to provide information in respect of a matter related to public safety.

The personal data may be used to administer and manage matters relating to EP's Clients' contractual obligations and to comply with any potential applicable regulatory requirements.

Resumes, CVs and career-related information you give to us should not include sensitive personal data. If your CV does contain any information such as this, then you agree that you have submitted it at your own risk. EP cannot control third parties' access to such information.

EP does not knowingly collect personally identifiable information from any person who is under the age of 18.

USE OF COLLECTED DATA

Because managing your career is a life-long process, we retain all information gathered about you to make repeat use of your information to maximize efficient, practical and relevant information related to business purposes until you change or remove your personal data as described below.





WHO HAS ACCESS TO THIS INFORMATION?

Provided personal data will be processed and stored in EP internal databases that may be accessible from other areas and other countries. EP may transfer such personal data to any of its affiliates, representatives, Clients, contractors or other individuals it deems appropriate for business purposes.

Access to personal data will be limited within EP to authorized personnel as required for business purposes as well as IT for security and maintenance.

When you provide personally identifiable information to EP it may become accessible to some of EP business partners such as companies we retain to fulfill requests for information (e.g. background checks) or to Clients for business purposes related to contracted programs or projects. In those cases, the other companies may also have access to your personally identifiable information. EP will take reasonable steps to ensure that there is a confidentiality agreement or other contractual agreement in place with any third-parties to whom it discloses personnel data for such business purposes.

There may also be instances where EP may be required to share your information with third-parties who have not been retained by us (directly or indirectly), for example, if we are required to do so because of an applicable law, court order or governmental regulation, or if such disclosure is otherwise necessary in support of any criminal or other legal investigation or proceeding here or abroad. Many entities receiving personally identifiable information under these conditions have privacy requirements that apply to their handling of your information.

Your personal data is never sold, rented or leased to any external company, unless you have granted us permission to do so.

HOW IS PERSONAL INFORMATION TRANSFERRED?

When EP transfers personal information to countries other than the country where the information was provided, we do so in compliance with applicable privacy laws. We endeavor to protect personal information entrusted to us no matter what country it is stored in or transferred to and have appropriate procedures in place to help ensure the security of your personal information.



DOES EP USE TECHNOLOGY LIKE COOKIES?

When you electronically access content provided by EP, we may automatically collect and store certain information in server logs. This may include:

- internet protocol address (IP addresses are assigned by your ISP and may be used to identify users)
- device event information such as errors, browser type, browser language, the date and time of your request, referral URL and visited URLs.
- cookies that may uniquely identify your browser to EP to allow automated access to certain services (this pertains to EP personnel\users).

WHAT SECURITY PROCEDURES ARE IN PLACE TO PROTECT INFORMATION COLLECTED?

EP uses appropriate technical, administrative and physical safeguards to protect data that pertains to you from loss, misuse or alteration. Of course, no organization can guarantee the absolute security of personal information. You should keep in mind that Internet transmissions, particularly email transmissions, are never 100% secure or error-free. Accordingly, we also caution you to guard your own computer and password against unauthorized access by others.

HOW CAN THE INFORMATION THAT EP COLLECTS BE MODIFIED?

You have the right to know the personal information that Ep holds about you (subject to certain legal limitations). You may access, review, correct, update, change or delete (Opt-out) the information we hold in our staffing database at any time. This information will be provided in line with the local data access law/policies.

EP will confirm your rights of access to such personal information data. This may include the origin of such data, the purposes for which it has been collected, processed and transferred and the recipients of such data.

EP will allow you to view your personal information data within a reasonable period, within relevant legal time limits and subject to local legal requirements.



You are encouraged to ensure that personal information data is kept up to date and amend any such data, which is inaccurate or out of date (e.g. name and address).

You have the right to review your personal data and to request that your personal data be corrected and/or amended. All requests to access and review personal data must be made via email to hr@execuPOWER.com.

QUESTIONS RELATED TO THIS POLICY SHOULD BE DIRECTED TO:

Questions or comments related to this policy should be submitted to the Chief Operating Officer of ExecuPOWER, Inc., 555 Croton Road, Suite 307, King of Prussia, PA 19406, USA.

NOTIFICATION OF CHANGES

As EP evolves and as privacy laws and regulations change, it may be necessary to revise or update our Privacy Policy. When we do we will also revise the "last updated" date at the top of the Privacy Policy.

