

# GENERAL PRIVACY POLICY

Last Updated: 02 November 2022

Supply Chain Survivors and its applicable affiliates based in the United States (“Company”, “we”, “us”, “our”) are committed to protecting and respecting your privacy.

This General Privacy Policy describes our privacy practices in relation to the information we collect from you when you visit our website, which is accessible at [www.supplychainsurvivors.com](http://www.supplychainsurvivors.com) or when you access or use any applications or features made available by us on or through or in connection with this Website or our services that link to this General Privacy Policy (collectively, the “Website”).

## **Personal Information we may collect from you in using this Website.**

When you visit and interact with this Website, we collect information about you, including Personal Information. “Personal Information” means information that identifies or relates to you, or as defined under applicable law. The following identifies the categories of Personal Information we collect directly from you (or about you) and how we collect such data:

### **Online forms and accounts.**

When you complete an online form or create an account on our Website, we may collect contact information such as your name (first and last), e-mail address, telephone number, physical address, and online user account details (collectively, “Identifiers”). We may also collect information pertaining to your professional and educational status (collectively, “Education and Qualifications”).

### **Communication with us online.**

We will collect any Personal Information you provide to us when you use our contact forms (for example “Contact”, “Contact us today”, “Send us a message”, or “Contact us about working together”). Providing us your Personal Information via our contact forms is not required; however, please note that fields marked with an asterisk (\*) are mandatory fields, because we have determined we need this information to comply with or respond to your request, or to improve your future experiences with us and our Website. Other information or Personal Information you share with us when completing our contact forms is at your sole discretion. If you contact us, we will keep a record of that correspondence in accordance with our established retention protocol.

### **Marketing.**

We also may collect information for marketing purposes and analysis, including information on how you respond to email, phone and other marketing campaigns as well as feedback you provide about us and our services through our satisfaction surveys (collectively, “Correspondence and Feedback”).

Your company’s business needs:

If you are interested in our suite of service offering such as career development for a whole team, we may collect Personal Information and other information about you in connection with your company’s employment or other needs, including without limitation, Identifiers such as your name (first and last), e-mail address, telephone number, as well as your company name, job title, job function, job level, industry, staffing or employment challenges, your location, sector, company registration number, purpose of attendance (at an event), size of opportunity, and type of staffing or other need.

## **Social media, online forums, blogs, message boards.**

We also may collect Personal Information and other information about you when you choose to interact with us through social media platforms on which we are active. In addition, we also may collect the Personal Information you make available on your public social network profiles and on other public locations, including, without limitation, on Facebook, LinkedIn, Twitter, Instagram, or other company websites and/or job boards. The Personal Information we collect in this manner may include Identifiers (name (first and last), contact information, and location) and Education and any other information you make available on social media platforms and other public locations (collectively, "Social Media Information").

Cookies and automated technology: For more information about the information we collect about your equipment browsing actions, and patterns, please consult the "Cookies and automated technology" section below.

We also collect any other Personal Information you choose to provide to us or we obtain about you.

## **Sensitive Personal Information.**

When you visit or interact with our Website, you are not required to submit information that may be considered sensitive, including your race or ethnic origin or data concerning your health or sexual orientation. If you decide to provide us with sensitive Personal Information, we will handle the information according to the practices identified in this General Privacy Policy as well as those identified in the Candidate Privacy Information Statement available at <https://www.supplychainsurvivors.com/us/en/candidate-privacy>. We reserve the right to delete the information from our databases in accordance with applicable law.

## **How we use your Personal Information**

We collect and use the information or Personal Information we collect from or about you, including your Identifiers, Education and Qualifications, Correspondence and Feedback, and Social Media Information, for the following business purposes:

- To best tailor content and resources according to your preferences.
- To respond to your requests or questions when you contact us.
- To help us create, publish, and improve content most relevant to you.
- To ensure that the content provided through the Website is presented in the most effective manner for you and for your device.
- To allow you to participate in interactive features of our Website, when you choose to do so.
- Where necessary, to comply with any legal obligation.
- For our business contacts, to attempt to establish or strengthen a business relationship with you. This may include, for example, informing you how we can assist you with our services.
- investigating or responding to incidents and complaints, and/or
- complying with investigations carried out by the police, government or regulators.
- Commercial purposes.

We may use your Identifiers, Education and Qualifications, Correspondence and Feedback, and Social Media Information in order:

- To send you direct messaging or marketing via email, text message, and/or other communication means. You may opt-out of receiving future messaging or marketing communications at any time by emailing us using the information listed in the "Contact" section below.
- To inform you about services, products, events that might be of interest to you (we may communicate by email, telephone, text message, mail and/or other communication methods).
- To send to you other information – such as Company upcoming events or newsletters – that may be

- of interest to you.
- To perform analytical research on our prospective client and candidate base, including the content, and the services/products in which they are interested.

Our use of your information as described above is permitted by applicable data protection law because it is:

- Necessary for our legitimate interests in pursuing the purposes set out above, and such interests in each case not being overridden by your privacy interests;
- In some cases, necessary to meet our legal or regulatory responsibilities, such as disclosures to authorities, regulators or government bodies; or
- In some cases, necessary for the performance of a task carried out in the public interest and when we use special categories of personal information, necessary for establishing, exercising or defending legal claims or where the processing relates to personal information manifestly in the public domain;
- in limited circumstances, processed with your consent which we obtain from you from time to time, such as when you opt-in to receive marketing communications and news via email.

Do you have to give us your Personal Information?

You do not have to provide your Personal Information to us when generally navigating our Website. However, if you do not provide us with a required minimum, it may limit the services you can receive from us.

Do we process information about you without human intervention at all?

Yes, at times we may use automated systems/processes to ensure we give you a bespoke experience with us.

How long do you keep my Personal Information?

We retain your Personal Information as long as necessary to fulfill the purposes set out in this General Privacy Policy in accordance with applicable legal and regulatory requirements. The retention periods of your personal information depend on the respective purpose for which the data is processed and the respective tool in which the personal information is processed. It is not possible to outline the various retention periods in a reasonably intelligible format under this Policy. The criteria used to determine the applicable retention period are that we will retain the personal information set out in this policy for as long as:

- (i) necessary for the respective purpose
- (ii) necessary to carry out our business relationship with you
- (iii) you have consented to, and/or
- (iv) required by applicable statutory retention laws.

## Sharing with third parties

To facilitate our efficient use of your information and Personal Information, and to provide you with content and/or resources, to fulfill a request you make of us, or to otherwise provide our services, we disclose your information, including the Personal Information identified in the “Personal Information we may collect from you in using this Website” section above, to the following third parties. :

1. *To our suppliers.* We engage suppliers to carry out administrative and operational work in support of our relationship with you. The supplier(s) are subject to contractual and other legal obligations to preserve the confidentiality of your data and to respect your privacy, and they will only have access to and use the data they need to perform their functions. The relevant suppliers are often IT suppliers (who, for example, host or support our IT systems, including information about you such as Identifiers and the information described in the “Cookies and automated technologies” section below), and/or back office finance and accounting management providers (who, for example, need to handle details, such as Identifiers, professional or employment-related information, and financial information like a bank account number of persons in order to process accounts payable and receivable). We also engage suppliers who provide technology services and solutions who, for example, provide video interview and skills assessment tools and may need access to your Identifiers, Education and Qualifications, Correspondence and Feedback, and Social Media Information.
2. *To other related companies located across the world whom are all commercial partners* of the same ultimate parent company that could perform a range of services including but not limited to temporary staffing and direct hire placement services, payroll services, recruitment and selection services, testing solutions services, talent development services, training and education services, outplacement and international mobility services
3. *Government & law enforcement.* We will share your data with government, regulators or law enforcement agencies if, at our sole discretion, we consider that we are legally obliged or authorized to do so or we believe it would be prudent to do so; and/or
4. *Corporate reorganization.* As part of due diligence relating to (or implementation of) a merger, acquisition or other business transaction, we may need to disclose your data to the prospective seller or buyer and their advisers.

## Cookies and automated technology

### Automatic Data Collection.

In addition to collecting Personal Information, we may use automatic data collection technologies to collect certain statistical (non-identifiable) information about your equipment, browsing actions, and patterns. This includes (i) details about your visits to our Website, which may include traffic data and location data, date and time of access, frequency and other communication data; and (ii) information about your computer and internet connection, which may include your IP address, operating system, browser type, and host domain; and (iii) details of referring website actions and patterns.

Cookies. We may collect information from you using a “cookie.” “Cookies” are small bits of data cached or stored on your computer based on your internet activity. They can be placed on your computer both by us as well as by third parties with whom we have a relationship, such as web analytic services and advertising networks. Cookies help us track and understand how individuals use and interact with our Website. For more information on the types of cookies that we use and your ability to disable cookies, please see the “Your choices regarding your Personal Information” section below and our Cookie Policy available at <https://www.supplychainsurvivors.com/en/cookie-policy>.

## **Web Beacons.**

We use a technology known as web beacons to collect your web log information. A web beacon is a small graphic used on a website or within an e-mail message designed to track pages viewed or messages opened. Web log information is gathered by the computer that hosts our Website (called a "webserver") when you visit our Website. Web beacons in e-mails help us determine which of our e-mail messages were opened and whether a message was acted upon. They also help us analyze the effectiveness of our web pages by measuring the number of visitors to certain pages of our Website and how many visitors click on key elements of it.

## **Social Media Plug-ins.**

Our Website uses social media plugins ("Plugins") from the social networks such as Facebook, LinkedIn, tik tok and Instagram to enable you to easily share information with others. We may use information collected from the Plugins to learn about your interests and to help us better understand how to serve you. This information may include your preferences about how to contact you or further develop a business or professional relationship with you as well as demographic data. For more information, please visit our Cookie Policy at [//www.supplychainsurvivors.com/](http://www.supplychainsurvivors.com/)

## **International Users.**

Users who use the Website outside of the United States understand that their data will be collected, used, and stored in the United States.

## **Data Security.**

We maintain commercially reasonable security safeguards designed to protect the Personal Information we collect against unauthorized use, disclosure, alteration or destruction. Although we aim to protect the security and integrity of the Personal Information we collect, we cannot guarantee or warrant that any information, during transmission through the Internet or while stored on our system or otherwise in any case, is 100% secure from intrusion by others. If you have reason to believe that your interaction with us is not secure or that data has been compromised, please immediately notify us of the problem by contacting us using the contact information below.

Your choices regarding your Personal Information

Disabling Cookies and Managing the Collection of Your Personal Information. At any time, you can disable cookies by adjusting your browser settings. Each browser is different, so please refer to the specific instructions related to your browser to learn more about cookie-related and other privacy and security settings that may be available to you.

Please note, by disabling cookies, you may not be able to take full advantage of the services offered by our Website. For more information, please visit our Cookie Policy at <https://www.supplychain survivors.com>

Do Not Track. Currently we do not alter our information collection and use practices in response to Do Not Track signals.

Commercial E-mails, Newsletters, and Other Communications. Where we send marketing or other communications to you, you may opt out of receiving any further communications by contacting us or using the 'unsubscribe' or 'opt-out' function when available. You can also exercise your opt-out right at any time by contacting us using the information listed in the "Contact" section below and providing the following information: your name, your email address, a contact telephone number, the marketing communications you would like to opt out of receiving.

## **Your rights.**

You have certain legal rights with respect to the Personal Information that you provide and/or which we obtain about you depending on the state/country where you reside.

For example, if you are a resident of California, the California Consumer Privacy Act ("CCPA") (Civil Code § 1798.100, et seq.) provides you with specific rights regarding your Personal Information depending on the nature of your relationship with us. Additionally, by way of example, if you are a resident of the European Union, the General Data Protection Regulation ("GDPR") provides you with specific rights regarding your Personal Information depending on the nature of your relationship with us.

Where applicable, your rights include, among others:

- Right to be informed about collection, sale or disclosure:

You have the right to be informed of the categories of Personal Information that we collect about you as well as the categories of sources from which the Personal Information was collected. You also have the right to be informed of the business or commercial purposes for which we use, disclose, or sell, your Personal Information as well as the categories of third parties with whom we share that Personal Information, as set forth in this Privacy Policy.

- Right to access and obtain a copy of your Personal Information:

You have the right to request that we disclose certain information to you about our collection, use, and disclosure of your Personal Information. Once we have verified your identity, we will disclose the specific pieces of Personal Information we collected about you in a portable and, to the extent technically feasible, in a readily usable format.

- Right to delete:

In certain circumstances, you may have the right to request that your Personal Information is deleted, subject to certain exceptions.

- Right to opt-out of the sale of Personal Information:

We do not sell your information. However, certain laws afford you the right to opt out of the sale of your Personal Information.

- Right to equal service for exercising your privacy rights:

Unless permitted by applicable law, we will not discriminate against you when you exercise your privacy rights under the California Consumer Privacy Act or other applicable law, including by: denying you goods or services; charging you different prices or rates for goods or services, including through the use of discounts or other benefits or by imposing penalties; providing you with a different level of quality of good or services; or suggesting that you will receive a different price or rate for goods or services or a different level of quality of goods or services.

To the extent our processing of your personal information is based on your consent, you also have the right to withdraw your consent at any time. Withdrawal of your consent will not affect the lawfulness of any processing based on your consent before the receipt of such withdrawal. You can also lodge a complaint about our processing of your personal information with your local data protection authority or regulator, as applicable.

## **Verifying Your Identity**

To exercise the rights described above, it may be necessary for us to verify your identity or authority to make the request and confirm the Personal Information relates to you. To exercise your rights, we will collect your name, e-mail and/or telephone to verify your identity. Upon receiving your request, we may also

contact you via e-mail and/or other secured communication channel to verify your identity by asking you additional security questions in order to match your identity with the data we maintain about you.

For residents of California only, you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. Your authorized representative may be required to submit a declaration or affidavit demonstrating that they have the authority to act on your behalf.

Once we have verified your identity, we will disclose the specific pieces of Personal Information we collected about you, by mail or electronically, at your option, in a readily usable format that allows you to transmit the information from one entity to another entity without hindrance. Please note that if we cannot verify your identity, we are not obligated to provide you or your authorized representative information regarding your Personal Information.

To submit a request or for more information on how to submit a request, please contact us using the information listed in the “Contact” section below. Making a verifiable consumer request does not require you to create an account with us.

### Shine the Light

California’s “Shine the Light” law (Civil Code Code § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please contact us using the information listed in the “Contact” section below.

### Children 's privacy.

Our Website is designed and intended for adults. By accessing and/or using our Website, you represent that you are a legal adult. If you are not a legal adult, you must have your parent or legal guardian access and use the Website for you. If you want to purchase any goods or services that may be offered on our Website, such purchase(s) must be made by your parent or legal guardian on your behalf.

Our Website is not intended for, and we do not knowingly collect information from or otherwise market our website or other materials to children under thirteen (13) years of age. If you are a parent or guardian of a child under the age of thirteen (13) and believe that he or she has disclosed Personal Information to us, please contact us using the information listed in the “Contact” section below. You may review and request the deletion of your child’s Personal Information or prohibit the further use of such information.

### Changes to this General Privacy Policy

The terms of this General Privacy Policy may change from time to time. We shall publish any material changes to this General Privacy Policy through appropriate notices either on this Website or contacting you using other communication channels. The date this General Privacy Policy was last revised is identified at the top of the page in the “Last Updated” legend.

### Contact

If you have any questions, comments and/or requests regarding this General Privacy Policy or to exercise your rights with respect to your Personal Information (as applicable), please contact us by email.