

# EASTRIDGE WORKFORCE MANAGEMENT

## Privacy Policy

**Last Updated: April 17, 2025**

### INTRODUCTION

This Privacy Policy (the "**Policy**") describes how Eastridge Workforce Management and its subsidiaries and affiliates (collectively "**Eastridge**", or "**we**", "**our**" or "**us**") collect, use, and process your Personal Data. This Policy is issued on behalf of all members of the Eastridge group of companies. When we refer to "Eastridge", we are referring to the relevant legal entity in the Eastridge group responsible for processing your Personal Data.

This Policy supplements any other privacy notices and is not intended to override them. This includes, but is not limited to, any provisions in the Employee Handbook.

For the purposes of this Policy:

- **"Internal Employee"** means an individual who works, or is applying to work, for Eastridge in the capacity of an employee internally at Eastridge.
- **"Personal Data"** means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to any individual or a household.
- **"Processing"** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **"Sensitive Personal Information"** means Personal Data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data processed for the purpose of uniquely identifying a person, data concerning health, or data concerning a person's sex life or sexual orientation, as well as government-issued identifiers and financial information as defined by applicable law.
- **"Temporary Worker"** means an individual who works, or is applying to work, for Eastridge in the capacity of an employee whom Eastridge assigns to work at Eastridge's clients.

- **"Worker"** means an Internal Employee, or a Temporary Worker.

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### 1. PERSONAL DATA WE COLLECT

The categories of Personal Data collected may include the following:

- **Identifiers**, such as your name, username or similar online identifier, password, employee/staff ID, date of birth, Social Security number or equivalent national identification number, driver's license, state identification card, passport number, or other government issued identification card.
- **Contact Information**, such as your work and home addresses, telephone numbers, email addresses, and emergency contact details.
- **Characteristics of protected classifications under applicable law**, such as your race, age, gender, national origin, citizenship, self-identification of disability, request for leave for family care, health condition, pregnancy, military or veteran status, and marital status.
- **Information about your job**, such as job title, category and status, work location, department, employment contract, assigned tasks and projects, weekly hours, supervisor's name, start and end date, and reason for leaving.

- **Education information**, such as your education and training background.
- **Professional or employment related information and documents**, such as prior work experience and any other information that may be included in your resume or job application, training, confidentiality agreements, and proprietary rights agreements.
- **Internet and other electronic network activity information**, such as information about how you use our website, products and services using cookies, IT systems usage information related to your use of our equipment, systems, and other resources.
- **Audio and visual information**, such as photographs and phone and video recordings.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences, email content, business letter content, business documents, and chat content.
- **Data Voluntarily Submitted** including any data that you voluntarily submit through contact forms, resume, or cover letter.
- **Performance and disciplinary information**, such as performance reviews, evaluations and ratings, information about disciplinary allegations, the disciplinary process and any disciplinary warnings, details of grievances, and any outcome.
- **Information about your compensation and benefits**, such as your basic salary, bonus and commission entitlements, insurance benefits (including information about you and your dependents that we provide to the insurer), hours and overtime, tax code, holiday entitlement, accrued salary information, and information relating to your pension.
- **Family Information**, such as the marital status, name, relationship, date of birth, and social security numbers of your family members and any other information that may be needed for the administration of benefits, and contact details to identify who to contact in the case of an emergency.
- **Financial information**, such as your bank details (for payroll and travel reimbursement purposes only) and business travel and entertainment data.
- **Health information**, as required by law or as necessary to manage the employment relationship, including benefits administration, occupational health, disability accommodation, workers' compensation, and leaves of absence.

- **Current Union membership status**, as required by law to ensure benefits, terms of employment, and employment policies comply with the Union's requirements or any relevant collective agreement.
- **Termination and Post-Employment Information**, such as termination agreements, benefits notices, and unemployment compensations forms.

### **Sensitive Personal Information**

We collect Personal Data that is defined as "Sensitive Personal Information" under applicable privacy laws, including driver's license, state identification card, passport, or other government issued identification card, social security numbers, race or ethnic origin, citizenship, immigration status, and health information. We use and disclose Sensitive Personal Information only as necessary:

1. To process your request for employment
2. To provide services and benefits in connection with your employment
3. To comply with the law
4. For business purposes reasonably expected within the scope of your employment
5. To protect against malicious, fraudulent, or illegal activity

Under the GDPR and similar privacy regulations, we process special categories of personal data only where:

1. You have given explicit consent
2. Processing is necessary to carry out obligations under employment, social security or social protection law
3. Processing is necessary to protect your vital interests or those of another person
4. Processing relates to data manifestly made public by you
5. Processing is necessary for the establishment, exercise, or defense of legal claims

## **2. HOW WE COLLECT YOUR PERSONAL DATA**

We collect your Personal Data from a variety of sources and methods. This includes:

### **Information You Voluntarily Provide to Us**

We collect Personal Data from you that you voluntarily provide to us, including when you:

- Fill out a Contact Us form

- Subscribe to our publications
- Create an account
- Request marketing materials
- Request reminders to apply for an open position
- Fill out an employment application and during the scope of your employment
- Give us feedback
- Attend any of our events, promotions, or other programs where we collect information about you

### **Information We Collect When You Use Our Systems**

We collect Personal Data when you use our systems, including computer systems, security systems, time keeping systems, and any internal intranet or online platforms.

### **Information We Collect When You Use Our Website**

**Automated technologies or interactions.** If you use one of our websites, we receive and store internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. When you access and use our website from your mobile devices, we receive data from that mobile device. This may include your device ID, location data, IP address and device type.

You may manage how your mobile device and mobile browser share location information with us, as well as how your mobile browser handles cookies and related technologies by adjusting your mobile device privacy and security settings. Please refer to instructions provided by your mobile service provider or the manufacturer of your device to learn how to adjust your settings.

**Cookies.** Our websites may also place cookies on the device that you use to access the websites. Cookies are small files that we or our service providers transfer to your device through your web browser that enables us or our service providers' systems to recognize your browser and capture and remember certain information. We use cookies to help us understand how users use the website.

For example, cookies gather information about how long you spend on a web page so that we can understand what web pages are of most interest to users. If you prefer, you can opt out of cookies when you visit our website through the cookies pop up that appears when you visit our website by choosing to decline cookies and also choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off cookies

by adjusting your browser settings. If you turn off your cookies, some of the features of the website may not function properly.

You can view the Cookies that we use [here](#).

**Your 'Do Not Track' Browser Setting.** Some web browsers incorporate a "Do Not Track" feature (DNT) that signals to the websites that you visit that you do not want to have your online activity tracked. For more information about DNT signals, please visit <http://allaboutdnt.com>. Our website responds to web browser DNT signals. If you have selected this web browser setting, consent to nonessential cookies on our website will automatically be declined.

**Global Privacy Control.** We honor Global Privacy Control (GPC) signals. If your browser supports GPC, you can turn on this feature to opt-out of the "sharing" of your Personal Data.

### **Information We Collect From Third Parties**

**Service Providers.** We collect Personal Data from service providers including where we operate accounts on third-party platforms, such as recruiters, job boards, background check providers, employee benefit and insurance providers, training platforms, time keeping and payroll providers, communications and video conference providers, and other software and technology providers. We also collect Personal Data from clients.

**Google Analytics.** We use Google Analytics to assist us in better understanding our website visitors. Google Analytics uses a first party cookie, identifiers for mobile devices, or similar technology to collect usage data. Based on this information, Google Analytics compiles data about website traffic and interactions, which we use to offer better user experiences, perform analytics, analyze traffic, personalize content, and offer ads that match your interest. You can learn more about how Google Analytics collects and uses information from their website at: [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

**Snitcher.** We use Snitcher to identify businesses visiting our website based on IP addresses. For this purpose, Snitcher processes IP addresses and sets a cookie named 'SNID' with a lifetime of two years to distinguish between visitors. This processing is based on our legitimate interest to understand which businesses interact with our content. Snitcher's servers are located in Frankfurt, Germany (EU).

### **3. LEGAL BASIS FOR PROCESSING**

Under the General Data Protection Regulation (GDPR) and similar privacy laws, we must have a legal basis for processing your personal data. Our legal basis depends on the purposes for which we use that data and may include:

- **Consent:** Where you have given us clear consent to process your personal data for a specific purpose.
- **Contractual Necessity:** Where processing is necessary for the performance of a contract with you or to take steps at your request before entering into a contract.
- **Legal Obligation:** Where processing is necessary for compliance with a legal obligation to which we are subject.
- **Legitimate Interests:** Where processing is necessary for our legitimate interests or those of a third party, provided those interests are not overridden by your interests or fundamental rights and freedoms.
- **Vital Interests:** Where processing is necessary to protect your vital interests or those of another person.
- **Public Interest:** Where processing is necessary for the performance of a task carried out in the public interest.

When we process special categories of personal data, we rely on explicit consent, employment and social security laws, or other legal bases specifically permitted under applicable law.

#### **4. HOW WE USE YOUR PERSONAL DATA**

Eastridge uses Personal Data for all purposes related to the creation, administration, and termination of Internal Employees' and Temporary Workers' employment relationship with Eastridge and for all purposes related to vetting Direct Hires to work at Eastridge's clients. These purposes include, but are not limited to, the following:

- To respond to requests for information
- To evaluate feedback and complaints
- To communicate with users
- To evaluate applicants for internal jobs
- To evaluate applicants for temporary assignments with Eastridge's clients
- To improve our products and services
- To continuously evaluate and improve the online experience
- To prepare headcount reports and other reports related to the workforce of the Eastridge family of companies

- To administer employee compensation, including payment of wages and bonuses, income tax withholding, and reimbursement of business expenses
- To administer employee benefits
- To administer performance appraisals, safety, and travel arrangements
- To manage and administer pay adjustments or periodic bonuses
- To administer leaves of absence as required by law or company policy
- To monitor and enforce compliance with internal policies
- To provide employee contact information to current and prospective customers
- To engage in succession planning
- To administer access to our physical facilities
- To administer training of employees
- To comply with mandatory government reporting requirements
- To provide Help Desk support to employees
- For Temporary Employees: to place you with clients by matching your qualifications against the client's staffing needs; to manage and administer the assignment to a client; and to create reports, including reports detailing turnover and retention rates
- For recruitment purposes
- To assess qualifications of applicants and eligibility to work
- To administer secure access to our IT resources
- For emergency contact purposes
- To conduct audits as required by law
- To resolve issues submitted to Eastridge's hotline
- To exercise Eastridge's rights under applicable law and to support any claim, defense, or declaration in a case or before a jurisdictional and/or administrative authority, arbitration, or mediation panel
- To meet legal and regulatory requirements including civil discovery in litigation involving Eastridge or affiliated companies
- To facilitate administrative functions



- Equal opportunities monitoring

## **5. HOW WE DISCLOSE PERSONAL DATA**

### **Information You Direct Us to Disclose**

You may be presented with an option on our service to have us send certain information to third parties or give them access to it. If you choose to do so, your Personal Information and other information may be disclosed to such third parties. Additionally, when you apply for a position, we disclose Personal Data for Temporary Workers and Direct Hires to clients for the purposes of evaluation, hiring, placement, and to comply with legal obligations but only to the extent required to meet these purposes.

In some cases, we may also disclose Personal Data to clients' affiliated entities, including parent, subsidiaries, and other related entities to meet these business purposes. Please note, we will not share your phone number or SMS consent information with any third parties for marketing purposes. All information you disclose will be subject to the third-party privacy policies and practices of such third parties.

### **Personal Data We Disclose for a Business Purpose**

**Service Providers.** We may use third-party service providers to perform certain business services on behalf of us or the services and may disclose Personal Data to such service providers as needed for them to perform these business services. Service providers are only allowed to use, disclose or retain the Personal Data to provide these services and are prohibited from selling Personal Data. Business services provided include, but are not limited to:

- Background check and employee eligibility providers
- Employee benefit and insurance providers
- Training platforms
- Time keeping and payroll providers
- Security and building access providers
- Healthcare providers
- Uniform companies
- Communications and video conference providers
- Internal social media platform provider

- Software and technology providers

**Internal Third Parties.** We may disclose Personal Data to our parent company, subsidiaries and other related companies owned by or controlled by or under common ownership, who may use the Personal Data for the purposes described above.

Categories of Personal Data that have been disclosed for a business purpose in the past twelve months to service providers and internal third parties include:

- Identifiers
- Contact Information
- Characteristics of protected classifications under applicable law
- Information about your job
- Education information
- Professional or employment related information and documents
- Internet and other electronic network activity information
- Audio and visual information
- Marketing and Communications Data
- Data Voluntarily Submitted
- Performance and disciplinary information
- Information about your compensation and benefits
- Family Information
- Financial information
- Health information
- Union membership status
- Termination and Post-Employment Information

### **Personal Data Sold or Shared**

We do not sell any Personal Data. In the United States, we have shared information about your interaction with our website in the past twelve months with Google by allowing Google to place cookies and a Remarketing Code on our website for data analytics and to serve ads to you about our products and services as you browse the Internet.

[Click here to learn more about how Google collects and uses information from their website.](#) You can opt out of sharing by selecting decline cookies when you first visit our website, setting your web browser to decline cookies and sharing, or by clicking on the "Do Not Share My Personal Data" link. Additionally, if your browser supports it, you can turn on the Global Privacy Control (GPC) to opt-out of the "sharing" of your Personal Data. Learn more at the [Global Privacy Control](#) website.

We share information about your interaction with our website with Snitcher for the purpose of identifying businesses that visit our website. [Click here to learn more about how Snitcher collects and uses information from their website.](#) This information includes IP addresses and browsing behavior on our site. You can opt out of sharing by selecting decline cookies when you first visit our website, setting your web browser to decline cookies and sharing, or by clicking on the "Do Not Share My Personal Data" link. Additionally, if your browser supports it, you can turn on the Global Privacy Control (GPC) to opt-out of the "sharing" of your Personal Data. Learn more at the [Global Privacy Control](#) website.

We do not have any actual knowledge of selling or sharing Personal Data of minors under 16 years of age.

### **Business Transactions**

We may do business with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. During the period leading up to and including the completion, if any, of a business transaction, your Personal Data may be collected, used or disclosed but such collection, use or disclosure will be restricted to purposes that relate to the business transaction. If a change happens to our business, then the new owners may use your Personal Data in the same way as set out in this Policy.

### **Legal Process**

Subject to applicable law, we may disclose information about you:

1. If we are required to do so by law, regulation or legal process, such as a subpoena
2. In response to requests by government entities, such as law enforcement authorities
3. When we believe disclosure is necessary or appropriate to prevent physical, financial or other harm, injury or loss
4. In connection with an investigation of suspected or actual unlawful activity

### **Information You Provide To A Third Party**

We may contract with third party service providers that operate their own websites and online platforms on which you will need to create an account ("Third-Party Sites"). Eastridge does not control any Third-Party Sites and is not responsible for any information they may collect. The information collection practices of a Third-Party Site are governed by its privacy policy. It is your choice to enter any Third-Party Site. We recommend that you read its privacy policy if you choose to do so.

## **6. INTERNATIONAL DATA TRANSFERS**

As a global organization with entities and operations across different countries, we may transfer your personal data between countries to fulfill the purposes described in this Privacy Policy. This includes transfers to countries outside the European Economic Area (EEA), United Kingdom, or other regions with comprehensive data protection laws.

When we transfer personal data internationally, we implement appropriate safeguards to ensure that your data receives an adequate level of protection, such as:

- Standard Contractual Clauses (SCCs) approved by the European Commission
- Binding Corporate Rules
- Certification mechanisms (e.g., EU-US Data Privacy Framework)
- Contractual arrangements with data recipients

For EEA, UK, and Canadian residents: By providing us with your personal data, you acknowledge and consent to the processing of your data in countries outside your country of residence, including the United States, which may have different data protection rules than in your country. We will ensure appropriate safeguards are in place to protect your information when transferred internationally.

For residents of Quebec: You have specific rights regarding the transfer of your personal information. We implement measures to ensure that your data receives equivalent protection when transferred outside Quebec.

To request more information about our international data transfer mechanisms, please contact our Privacy Officer at [privacy@eastridgewm.com](mailto:privacy@eastridgewm.com).

## **7. DATA SECURITY**

We have technical, administrative, and physical security measures in place designed to protect your Personal Data from unauthorized access or disclosure and improper use. For example, we use Transport Layer Security (TLS) encryption to protect the data collection forms on our website. In addition, we restrict access to your Personal Data to employees

who need the Personal Data to perform a specific job (for example, a customer service representative). Employees with access to Personal Data are kept up-to-date on our security and privacy practices.

It is important for you to protect against unauthorized access to your password and to your computer. Be sure to close your browser after you have completed your visit to the website or any of our online systems. Please note that despite our reasonable efforts, no security measure is ever perfect or impenetrable, so we cannot guarantee the security of your Personal Data.

## **8. DATA RETENTION**

For each category of Personal Data, we will retain the information as long as is reasonably necessary to fulfill the purpose for which it was collected and to comply with applicable laws and regulations. We consider the following criteria when determining how long to retain Personal Data:

- The purpose for which we collected the Personal Data
- The nature and sensitivity of the Personal Data
- Our legal obligations related to the Personal Data
- Applicable statute of limitations periods
- The risks associated with retaining the Personal Data

When we no longer need personal data, we securely delete or anonymize it. Anonymized information may be retained for statistical, research, or analytical purposes.

## **9. YOUR PRIVACY RIGHTS**

Depending on your location, you may have certain rights regarding your personal data. These rights may include:

### **For All Users:**

- **Right to Access:** Request information about what personal data we hold about you and how we process it.
- **Right to Rectification:** Request correction of inaccurate or incomplete personal data.
- **Right to Erasure:** Request deletion of your personal data in certain circumstances.
- **Right to Object:** Object to certain types of processing, including direct marketing.

- **Right to Withdraw Consent:** Withdraw your consent at any time when we process data based on your consent.

### **For California Residents (CCPA/CPRA):**

California residents have the following rights:

- **Right to Know:** Request information about what personal data we've collected, used, disclosed, or sold.
- **Right to Delete:** Request deletion of personal data we've collected from you.
- **Right to Correct:** Request correction of inaccurate personal data.
- **Right to Opt-Out of Sale/Sharing:** Opt out of the sale or sharing of your personal data.
- **Right to Limit Use of Sensitive Personal Information:** Request limitation of the use of your sensitive personal information to specified purposes.
- **Right to Non-Discrimination:** Exercise your rights without discrimination.

### **Exercising Your California Rights**

Requests can be submitted by:

- Calling our toll-free number +1 800-778-0197
- Contacting the HR Department at [externalhr@eastridgewm.com](mailto:externalhr@eastridgewm.com) (current employees)
- Clicking here: [CCPA Request Form](#)
- Clicking on "Do Not Share My Personal Data" link
- Using Global Privacy Control (GPC) in supported browsers

Only you, or a person that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Data.

For information about authorizing an agent, the verification process, and exceptions, please see the full version of this Privacy Policy on our website.

### **For EU/UK/EEA Residents (GDPR):**

Under the General Data Protection Regulation, you have the following rights:

- **Right to Access:** Obtain confirmation of whether we process your personal data and access to such data.
- **Right to Rectification:** Correct inaccurate personal data and complete incomplete data.
- **Right to Erasure:** Request deletion of your personal data in certain circumstances.
- **Right to Restrict Processing:** Request restriction of processing in certain circumstances.
- **Right to Data Portability:** Receive your personal data in a structured, commonly used, machine-readable format.
- **Right to Object:** Object to processing based on legitimate interests, public interest, or profiling.
- **Rights Related to Automated Decision Making:** Not be subject solely to automated decision-making with significant effects.
- **Right to Lodge a Complaint:** File a complaint with a supervisory authority.

### **Exercising Your EU/UK/EEA Rights**

To exercise your GDPR rights, please contact our Data Protection Officer at [privacy@eastridgewm.com](mailto:privacy@eastridgewm.com) or our EU Representative (details provided in the Contact Information section).

We will respond to all legitimate requests within one month. If your request is particularly complex, we may need to extend this period by an additional two months, but we will notify you of this extension.

### **For Canadian Residents:**

The Company makes commercially reasonable efforts to keep your personal information complete, up-to-date and accurate. Should you wish to access, update, correct or delete your personal information, or express any concerns regarding our use of your personal information, please contact our Privacy Officer at [privacy@eastridgewm.com](mailto:privacy@eastridgewm.com).

We ask that you provide us with the name, address and email address that you previously provided to us, a brief description of under what circumstances you provided your personal information to the Company, and the purpose of your request. If you are unsure as to whether the Company is holding any personal information that belongs to you, you may also contact our Privacy Officer for confirmation.

## **Quebec Residents**

If you are a resident of Quebec, you have certain additional rights under applicable data protection laws. These may include:

- The right to restrict dissemination of your personal information
- The right to have your personal information de-indexed from search results (the right to be forgotten)
- The right to be informed when your personal information was used to render a decision based exclusively on automated processing
- The right to request further information about the automated decision-making
- The right to data portability

If you have a request regarding these rights, please contact our Privacy Officer at [privacy@eastridgewm.com](mailto:privacy@eastridgewm.com).

## **10. CHILDREN'S PRIVACY**

Our website and online services are intended for adult use only and are not directed towards children, minors, or anyone under the age of 18. If you are under the age of 13, you are not authorized to provide us with any Personal Data. If the parent or guardian of a child under 13 believes that the child has provided us with any Personal Data, please contact us at the email address below and ask to have this Personal Data deleted from our files.

## **11. CHANGES TO THIS PRIVACY POLICY**

We may modify or update this Policy from time to time. We encourage you to revisit this page often to remain fully informed of our Policy or you can contact us at any time to obtain the latest copy of this Policy. When we make material changes to this Privacy Policy, we will notify you by email or through a notice on our website homepage.

## **12. CONTACT INFORMATION**

If you have any questions or concerns about this Policy, you can contact us:

### **By email:**

- [hr@eastridgewm.com](mailto:hr@eastridgewm.com) (general inquiries)
- [privacy@eastridgewm.com](mailto:privacy@eastridgewm.com) (privacy specific inquiries)

### **By phone:**



- 1.800.918.1678 (ask to speak to a member of the Human Resources Department)

**Data Protection Officer:** For EU/UK data protection matters, our appointed Data Protection Officer can be contacted at [privacy@eastridgewm.com](mailto:privacy@eastridgewm.com).

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