



# Clients And Prospects Privacy Notice

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Pontoon Solutions and/or its applicable affiliated companies (including Pontoon Solutions, Inc. and/or its applicable affiliated companies such as, but not limited to: Pontoon Europe Limited; Pontoon Philippines, Inc.; Pontoon Singapore Pte. Ltd.; Pontoon Australia Pty Ltd; Pontoon Germany GmbH;Pontoon Solutions Indonesia; Adecco Holding Emirates B.V.; Adecco Projecten B.V and PONTOON (France)) (“Company”, “we” or “us”) is committed to protecting and respecting your privacy.

This Clients And Prospects Privacy Notice (‘Privacy Notice’) describes what personal data we collect from you and how we collect, use and process it.

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### 1. **Some terms to be clear about**

In this Privacy Notice, you will be referred to as ‘**You**’.

When we talk about ‘**us**’ or the ‘**Company**’ we mean Pontoon Solutions. The Company is part of the Adecco Group AG (Adecco Group) with company headquarters at Bellerivestrasse 30, 8008 Zurich, Switzerland.

To carry out our Activities the Company uses several IT systems. In some cases, the Company provides a Self-Service Portal (‘**Portal**’) for its clients. The Portal allows you to manage the relationship with the Company and its sister companies and look for candidates that fit your needs.

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## 2. What information does the Company collect and use?

We collect and use information to provide the best possible opportunities that are tailored to you, which we have grouped together as follows:

- a) **Identity Data** means your first name, last name.
- b) **Professional Data** means your professional email address, professional phone number, company name, company address and phone number, job title, department, service, location of your office and other information that could be on your business card, and power of attorney.
- c) **Technical Data** means internet protocol (IP) addresses from which you access our or others products and services, cookies (as set out in our **Cookies Notice**), your login data (such as the time, date and duration), weblogs, the browser type and version you use to access our and others websites, apps and products and services, [traffic data], the time zone settings of your device and your device location, , browser plug-in types and versions that you use, [other communication data], the resources that you access on our websites, apps and products and services, operating system and platform of the device your use, and details of other technology on the devices you use to access this website and/or system.
- d) **Contact Forms Data** means any information you provide to us when you use our contact forms (for example using the “Contact”, “Send us a Message” or “Stay in touch” functions on our websites, apps, products or services), the record of that correspondence and other information or personal information you share with us when completing our contact forms in your sole discretion. (Please note that fields marked with an asterisk (\*) are mandatory fields, because we need this information to comply with or respond to your request.)
- e) **Marketing Communications Data** means information about how you respond to email, SMS, phone and other marketing campaigns.

We use the information you provide to deliver our products and services, to send you information that you requested, or to contact you to provide additional information on our available products and services as more particularly detailed in section 3 below.

## 3. Why do we process your data and how long do we keep it for?

Purposes of the processing	Type of data	Legal basis to process your personal information	Retention period
To manage our relationship with your organization, by establishing or strengthening a business relationship with you.	a) Identity Data b) Professional Data	Legitimate interests in managing our relationship with your organization.	5 years after the end of the business relationship

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To respond to your request or questions when you contact us.	a) Identity Data d) Contact Forms Data	Consent	2 years after the last contact
To send you newsletters or information on events that may be of interest to you, that you have signed up for.	a) Identity Data b) Professional Data e) Marketing Communications Data	- Consent - Fulfilment of our legitimate interests to promote our products and services	Until the end of the subscription.
To send you direct marketing via e-mail when the company that you are working for is our client currently or in the past, or when you opt-in for this purpose in the relevant contact form.	a) Identity Data b) Professional Data e) Marketing Communications Data	- Consent where we are required under the law to obtain consent for marketing - Fulfilment of our legitimate interests to promote our products and services where we are not obliged to obtain consent by law	Until the end of the subscription.
To identify what companies have interacted with us.	c) Technical Data	Fulfilment of our legitimate interests to administer our websites and/or systems and provide you with relevant information about our products and services	Duration of the session. For the Cookies Data, please refer to our <b>Cookies Notice</b>
To help us create, publish, and improve the most relevant content to you and for your device.	c) Technical Data	Fulfilment of our legitimate interests to administer our websites and/or systems and provide you with relevant information about our products and services	Duration of the session. For the Cookies Data, please refer to our <b>Cookies Notice</b>
To allow our clients to participate in interactive features of our websites	c) Technical Data	Fulfilment of our legitimate interests to administer our	Duration of the session. For the Cookies Data, please refer to our <b>Cookies Notice</b>



and/or systems, when you choose to do so.		websites and/or systems	
To allow non-clients participate in interactive features of our websites and/or systems, when you choose to do so.	c) Technical Data	To provide relevant information about our products and services	Duration of the session. For the Cookies Data, please refer to our <b>Cookies Notice</b>

#### **4. How do we collect your personal information?**

The personal information we collect about you comes from contact forms or other materials you submit to us, your interactions with us and others as part of your business relationship with us. Depending on the relevant circumstances and applicable local laws and requirements, we may collect some of the information listed in Section 2 when you provide us with your business card, talk to us at a conference or other event, or if you are a customer or prospective customer.

#### **5. Do we use artificial intelligence/ automated decision making?**

Yes, we do use artificial intelligence (AI) at times. However, we do not use your personal data in any automated decision making (a decision made solely by the creation and application of technologies without any human intervention) or profiling (processing of personal information with a range of technologies that produces a legal effect or similarly significant effect concerning you).

We use a range of technologies to analyse your data. In all cases, there is always human intervention in these processes, as we use these tools to support our expert human decision makers.

We use automated systems/processes with the conditions described in the previous paragraph to help our staff navigate in the market and consult you with the best-informed data as possible. We might use AI (for instance machine-learning logic or knowledge based and statistical approaches) to provide you, and our applicants as well as associates, with the services you request from us. While we do use AI systems, all decisions which may affect you are taken by our trained recruiters. Accordingly, these AI systems do not have legal effect.

#### **6. Do we share your data with third parties?**

To facilitate our efficient use of your information and to provide you with the content and/or resources and/or services, we disclose your information to third parties. However, this disclosure will only occur in the following circumstances:

- **To our suppliers.** We will, for example, engage a supplier to carry out administrative and operational work in support of our relationship with you. The supplier(s) will be subject to contractual and other legal obligations to preserve the confidentiality of your data and to

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respect your privacy, and will only have access to the data they need to perform their functions; the relevant suppliers are typically IT suppliers (who host or support our IT systems, including information about you), premises management companies (who look after physical security at our buildings, and therefore need to know about you to allow access to our buildings) and back office finance and accounting management providers (who need to handle details of candidates in order to process accounts payable and receivable).

- **To members of The Adecco Group and their affiliates (“Members of The Adecco Group”) within or outside the European Union.** A list of the countries in which we operate is available on our website at [www.adeccogroup.com/worldwide-locations](http://www.adeccogroup.com/worldwide-locations). Your information will be shared with them for different reasons:
  - information is shared with Members of The Adecco Group that provide IT functions for The Adecco Group companies worldwide;
  - information is also shared with Members of The Adecco Group worldwide (including the legal entities acquired after the collection of information) for the purposes previously described or to propose offers to you adapted to your profile where you have expressed an interest in local or international opportunities in that market, or Members of The Adecco Group identify that you may have particular skills required or helpful in that market.
- **To government or law enforcement authorities.** We will share your data with government, police, regulators or law enforcement agencies authorities if, at our sole discretion, we consider that we are legally obliged or authorised to do so or it would be prudent to do so.
- **To prospective seller or buyer and their advisors.** 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 advisors.

## **7. Do we transfer your data outside of your country?**

When we share your personal data within Pontoon Solutions, this involves transferring your personal data outside the European Economic Area (“EEA”) and the United Kingdom.

Our business operates globally and therefore your personal data may be transmitted internationally. Where we do so, we will endeavor to ensure appropriate measures, as required by law, are in place to ensure the adequate protection of your Personal Data.

We shall only transfer data to parties who are outside the European Economic Area or UK:

- to countries which the European Commission or the UK Information Commissioner believes offers an adequate level of protection pursuant to Art 45 of the UK and EU GDPR or;



- where the Adecco Group has put in place appropriate safeguards to seek to preserve the privacy of your information.

Please contact us at [privacy@pontoonsolutions.com](mailto:privacy@pontoonsolutions.com) if you would like further information about or a copy of the specific mechanism used by us when transferring your personal data out of your country of residence.

## **8. What data security measures do we have in place?**

We understand how important is to protect your personal information. We have implemented operational procedures and adequate technical and organizational security measures to prevent any unauthorised access, alteration, deletion or transmission of this personal information.

## **9. What are your rights regarding your personal information?**

Under applicable data protection laws, you have the following rights:

- **Right to access and obtain a copy of your personal information**  
You are entitled to request confirmation of whether we process any of your personal information. Where this is the case, you may have access to your personal information and to certain information about how it is processed. In some cases, you can ask us to provide you with an electronic copy of your information.
- **Right to the portability of your personal information**  
In some limited circumstances, you also have the right to request that we transfer (“port”) your personal information direct to another third party provider.
- **Right to correct your personal information**  
If you can demonstrate that personal data that we hold about you is not correct, you can ask that this information is updated or otherwise corrected.
- **Right to be forgotten or to delete personal information (Right to be Forgotten)**  
In certain circumstances you have the right to have your personal data deleted. You may make such a request at any time and we will evaluate if your request should be granted, however this right is subject to any legal obligations we may have to retain data. For situations where in accordance with the law, we determine that your request to have your personal information deleted must be granted, we will do so within the required legal timeframes.
- **Right to restrict the processing of your personal information**  
In certain circumstances you have the right to obtain restriction of the processing of your personal information,
- **Right to object to the processing of your personal information**  
In certain circumstances you have the right to object to certain processing thereof on grounds relating to your particular situation.
- **Right to withdraw consent**

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You have the right to withdraw consent at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you want to exercise any of your rights, please use our form by clicking [here](#).

Finally, you have the right to lodge a complaint about our processing of your personal data with the applicable data protection regulator to you.

## **10. How do we handle changes to this Privacy Notice?**

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

## **11. Contact**

In case you:

- have any questions or concerns regarding this Privacy Notice,
- would like further information about how we protect your information (for example when we transfer it outside your country), or
- want to contact [Privacy@Pontoonsolutions.com](mailto:Privacy@Pontoonsolutions.com) (Privacy Office)

To exercise any of your rights related to your personal data, please fill in [this form](#).