

# Privacy Policy

Latest Update: June 2019

Badenoch + Clark Norway (“B+C”, “we” or “us”) is committed to protecting and respecting your privacy.

This Policy (together with other documents referred to herein) describes what personal information we collect from you and how we process your personal information.

There is an index below, so you can go straight to the bits you want if you prefer.

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## **Personal information we collect from you**

- We will collect personal information on your visits to the Website including, but not limited to, traffic data, location data, weblogs, content from surveys and contact forms and other communication data and the resources that you access. Our collection of this personal information will make your visit to the Website easier in the future as we will be able to

suggest Content that is relevant to you based on the location you access the Website from.

- We will collect any information you provide to us when you use our contact forms (for example “Contact”, “Send us a Message”, “Get financial updates”, or “Contact us about working together”). The provision of your personal information via our contact forms is not a statutory or contractual requirement; however, please note that fields marked with an asterisk (\*) are mandatory fields, because we need this information to comply with or respond to your request. Other information or personal information you share with us when completing our contact forms is in your sole discretion. If you contact us, we will keep a record of that correspondence.
- We use your personal information to send you direct marketing via e-mail when you opt-in for this purpose in the relevant contact form. You may opt-out of receiving future marketing communications at any time.
- When you use or online services, we also store cookies as set out in more detail in our [Cookie Policy](#)

## **How we use your personal information**

Your personal information will be collected and handled by us for the following purposes:

- to best tailor Content and resources according to your preferences.
- to respond to your request or questions when you contact us.
- to send to you other information – such as B+C upcoming events or newsletters – that may be of interest to you.
- 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.
- to further develop and improve the Website and systems to better serve you.

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. See further information about B2B Communications in “Marketing communications” section below.

We may do some automated decisions solely on automatic processing, including profiling, i.e. the use of specific search criteria related to competence for finding right candidates registered in our database.

We will keep your information for the longer of the period required in order to meet our legal or regulatory responsibilities. “The retention periods of your personal information depend on the respective purpose the data are processed for and the respective tool such personal information are processed in. 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.

### **Marketing communications.**

We will only send marketing communications to you, as individual, normally by email where you have consented that we may do so.

We will usually offer you a check box on the forms we use to collect your personal information where, if you agree to receive marketing communications, you have to click the box.

B2B Communications. However, when you - representing or acting on behalf of a company or of any legal entity, private or public - provide us your personal data by contacting us as client or prospect, you allow Adecco to send you marketing communications normally by email. In that case, the processing of your personal data is based on our legitimate interest as legal ground to develop our customer data base, our customer loyalty programs and to introduce our services or future services that may be of interest to you.

In any case, where we send marketing communications to you via email, you may opt out of receiving any further marketing communications by clicking the ‘unsubscribe’ or ‘opt-out’ function in the email. In addition, you can also exercise your opt-out right at any time by contacting us at [privacy@adecco.no](mailto:privacy@adecco.no) 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.

## Sharing with third parties

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

- **To suppliers, contractors or agents:** from time to time we engage or employ other companies and individuals to perform functions on our behalf. This category of third-parties includes:
- **hosting providers**
- **providers maintaining the Website's content**
- **marketing services providers**
- **providers of financial updates upon your request**

Such recipients will only have access to your personal information as required by them to perform their functions and are not permitted to use such personal information for any other purposes. These recipients will be subject to contractual confidentiality obligations.

- **To other entities belonging to the Adecco Group** (i.e. any companies directly or indirectly controlled by Adecco). A list of Adecco Group companies is included here <https://www.adeccogroup.com/worldwide-locations/> including their suppliers, contractors and agents, which can be involved in the provision of the Website or the content, so that we can better serve you or, simply, to give response to your requests (e.g. when you use contact us forms).
- **To government or law enforcement authorities** if we determine in our sole discretion that we are under a legal obligation to do so.

## IP addresses and cookies

We collect information about your computer, including (where available) your IP address, operating system and browser type, for system administration. This is statistical data about our users' browsing actions and patterns and does not identify you or any individual.

For the same reason, we obtain information about your general internet usage by using a cookie file which is stored on your device. Cookies help us to improve the Website and to deliver a better and more personalized content. For more information about our use of cookies on the Website, please refer to our [Cookie Policy](#).

If your computer is shared with other people, we advise that you do not select the 'remember my details' option when that option is offered by the Website.

## **Where your personal information is stored and processed.**

As explained in the “Sharing with third parties” paragraph above, we share your personal information with the following:

- **Third party suppliers, contractors or agents:** where we use a third-party supplier, contractor or agent, your personal information remains under our control and we have controls in place to ensure your personal information is adequately protected.
- **Other companies in the Adecco Group:** we have entered into a groupwide arrangement to ensure your personal information continues to be subject to an adequate level of protection.

We endeavor to take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Policy.

## **Do we transfer your data outside of Norway?**

Your personal information can be transferred and processed in one or more other countries outside of Norway. We shall only transfer your data outside Norway to countries which provide adequate level of data protection as defined by Norwegian data protection law, or where the Adecco Group has put in place appropriate safeguards to seek to preserve the privacy of your information. As of now this include USA.

## **Data Security**

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

## **Your rights. How you can access, correct and delete 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 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. In

some limited circumstances, you also have the right to request portability of your personal information.

- **Right to correct your personal information:** If you can demonstrate that personal information we hold about you is not correct, you can ask that this information is updated or otherwise corrected.
- **Right to be forgotten/have data deleted:** In certain circumstances you have the right to have your personal data deleted. You may make such a request at any time and B+C will evaluate if your request should be granted, however this right is subject to any legal rights or 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, Adecco will do so without undue delay.
- **Right to restrict or object to the processing of your data:** In certain circumstances you have the right to obtain restriction of the processing of your personal information, or to object on certain processing thereof on grounds relating to your particular situation.

To exercise your rights, you can contact us at the following address:  
[privacy@adecco.no](mailto:privacy@adecco.no).

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 the data protection authority of the Member State of your habitual residence, of your place of work, or of an alleged infringement of your rights.

### **Changes to this Policy**

The terms of this Policy may change from time to time. We shall publish any material changes to this Policy through appropriate notices either on this website or contacting you using other communication channels.

### **Contact**

Questions, comments and requests regarding this Policy are welcomed and should be addressed to Adecco Group Norge AS, Sjølyst plass 2, pb 2013, 0125 Oslo or email address: [privacy@adecco.no](mailto:privacy@adecco.no)

You can request a copy of mechanisms relating to a specific transfer of your personal information by contacting [privacy@adecco.no](mailto:privacy@adecco.no)

You can also contact our Local Privacy Lead at the following address: Sjølyst plass 2, pb 2013 Vika, 0125 Oslo.