



## CONTINGENT EMPLOYEE DATA PRIVACY NOTICE

*Effective April 2025*

### OVERVIEW

**accesso** is committed to protecting the privacy and security of all individuals, including our contingent workers. This Notice describes how Accesso Technology Group Plc and its affiliates (**accesso**) act as data controllers with respect to the collection, use, and disclosure, of personal data about its contractors (“Contingent Workers”).

### SCOPE AND PURPOSE

This notice applies to all personal data collected, processed, and maintained by **accesso** in relation to its contingent workers engagement in compliance with applicable data protection laws and regulations. It provides detailed information on the types of personal data collected, the purposes for which it is used, the third parties with whom it may be shared, and the rights and choices available to contingent workers regarding their personal data.

## 1. PERSONAL DATA WE COLLECT

### 1.1. Personal Information

In the course of your relationship with **accesso** as a Contingent Worker, we may collect the following categories of personal data about you, directly from you and from other sources.

- **Name, identity and contact details** such as your name, date of birth, nationality, citizenship, gender, email address, telephone numbers, physical address;
- **Professional or employment related information** such as a description of your current position, job title, your employer (name and location), start and termination date(s) and reasons, and length of service;
- **Educational information** such as your academic history, qualifications, professional certifications and skills;
- **Emergency contact information** of individuals whose information you have provided;
- **Publicly available information** about you from sources such as social media sites (for example, LinkedIn); and

- **Other information** you choose to share with us such as hobbies, personal, and social preferences.

### *1.2. Sensitive Personal Information We Collect*

Some of the personal information we collect about you may be considered “Sensitive” under applicable laws. We will collect Sensitive personal information from you where we have a legal obligation to do so or with your explicit consent. The types of Sensitive personal information we process may include:

- **Identity and Immigration Information** such as social security number, passport, driver’s license, details of residency and work permit for purposes of verifying your legal ability to work and to maintain your employment with *accesso*;
- **Biometric Identifiers** such as fingerprints and facial recognition, for secure access authentication to systems;
- **Financial information** such as bank account details for payment processing.

### *1.3. Personal Information We Collect Automatically*

We may also collect information about you using cookies and similar technologies when you visit or browse our website. For more information, please see our [Privacy Policy](#)

### *1.4. Information We Collect from Other Sources*

- **Background check information** such as criminal records history, educational history, employment history and /or compensation history from employment screening agencies, former educational institutions and /or former employers (as allowed by local laws)
- **Information about your performance** from former employers you work with and/or with whom you may have worked in the past who may provide feedback about you.

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

We use your personal data for specific purposes and to manage your working relationship with us. Examples of why we use your personal data include:

- Facilitating compliance with contractual and legal obligations, such as any contract we may have with you or your Supplier;
- Administration and delivery of the Supplier contract, assessing your onboarding application and supporting;
- Background checks and verification of references and qualifications, processing payroll, withholding taxes (or addressing other income tax matters), or complying with various reporting or disclosure obligations under applicable law;

- Authorizing, granting, administering, monitoring, improving, and terminating access to, use of, or the efficiency of company issued, or company authorized application and systems (including social media), Information Resources and records to the extent permitted and in compliance with law;
- Protecting company assets, including and in connection with internal investigations through the (a) monitoring and review of email, communications, and information on company Information Resources to the extent permitted by and in compliance with law; (b) backup or storage of information on company desktops/laptops and other company Information Resources; and (c) authentication of employees' identities and the implementation of security measures;
- Comply with legal requirements, requests from regulatory and law enforcement authorities and meet contractual obligations;
- Management of the assignment, attendance, performance evaluation and feedback;
- Monitoring compliance with **accesso**'s policies, procedures and processes;
- Maintaining global address list;
- Other legitimate business reasons permitted or required by applicable law.

### **3. LEGAL BASES FOR PROCESSING YOUR PERSONAL DATA**

The legal bases on which we collect or process your personal data will depend on the specific personal information and the context in which we collect it. The processing of your personal data will take place based on one or more of the following legal bases where and to the extent they are permitted by applicable law:

- To comply with our legal obligations;
- For the performance of a contract (Example, to execute an agreement between you and **accesso** or you and the Supplier);
- With your consent
- To meet our legitimate interests (Example, for compliance with a law or as may be necessary for our operational purposes) so long as those legitimate interests are not overridden by your fundamental rights or interests.

### **4. DISCLOSURE OF YOUR PERSONAL DATA**

While we do not "sell" or "share" your personal data for cross-contextual behavioral advertising (as those terms are defined under applicable law), we may disclose your personal data to the following parties:

- Service providers and business partners that perform specific services on our behalf (for example, payroll processing, other administrative services and third-party auditors) as permitted by applicable law
- Government authorities, regulatory bodies, tax authority and law enforcement agencies, if necessary to comply with legal or regulatory obligations.
- Other entities within our corporate group for internal administrative purposes.

## 5. TRANSFERS OF PERSONAL DATA

**accesso** processes your personal data through our global platforms and on local systems. Operating our global platforms will involve transferring your personal data outside of your country to other countries where we operate and do business, including the United States, Canada, Mexico, Australia, and other countries. This means that when we collect your personal data it may be processed in countries that have data protection laws that do not offer the same level of protection as your country of residence. However, **accesso** will implement appropriate measures to provide a level of protection for personal information that is comparable to that of your country of residence which may include implementing Standard Contractual Clauses approved by relevant regulatory bodies.

## 6. DATA SECURITY

Protecting your data is fundamental to our business approach, and we allocate substantial resources to ensure its security. We have implemented appropriate technical and organizational security measures designed to protect your Personal Data against accidental loss, destruction, alteration and restriction of access on a need-to-know basis.

## 7. DATA RETENTION

**accesso** will retain personal data for the period necessary to fulfill the purposes set out in this Notice unless a longer retention period is required or permitted by law. The criteria for determining the duration for which we will retain your Personal Data are as follows:

- the length of our relationship with you;
- whether there is a legal obligation to which we are subject and,
- whether retention is advisable in light of our legal position (such as in regard of applicable statutes of limitations, litigation, or regulatory investigations).

## 8. YOUR RIGHTS

Subject to and to the extent provided under applicable law, you may have certain rights regarding your personal data including:

- The right to request access to, or copies of, your Personal Data that we process;

- The right to request rectification of any inaccuracies in your Personal Data that we process;
- The right to request erasure of your Personal Data that we process or control;
- The right to object to or restrict the processing of your Personal Data;
- The right to have your Personal Data transferred to another Controller, to the extent applicable;
- The right to lodge complaints with your Data Protection Authority regarding the processing of your personal data by us.

**accesso** will not discriminate against you for exercising your rights described in this Notice. We may need to request specific information from you to help verify and confirm your identity to exercise any of your rights.

To exercise any of your rights relating to your personal information, please submit your request via our webform at <https://www.accesso.com/forms/data-subject-access-request> or send an email to the Privacy Team at [PrivacyContact@accesso.com](mailto:PrivacyContact@accesso.com).

## **9. CHANGES TO THIS NOTICE**

This notice was last updated April 2025. We may update this Notice from time to time. When we do, we will let you know by appropriate means such as by posting an updated Notice or notifying you. Changes to this Notice will be posted on **accesso** career website.

## **10. CONTACT US**

If you have any questions or concerns about how your personal information is processed, please contact the Privacy Team at [PrivacyContact@accesso.com](mailto:PrivacyContact@accesso.com).