

## Privacy Statement

Kelly Services, Inc. and its subsidiaries respects your privacy and we acknowledge that you have certain rights related to any personal information we collect from you and we have certain obligations in respect of the same. Kelly Services supports the various international and local privacy laws, and has procedures in place to meet the requirements of those laws.

This Privacy Statement supports our privacy principles and informs you about our practices for gathering, storing, and using the personal information of individuals who use our websites, apply for or use our employment or outsourcing services, and those who are representatives of our customers (including prospective customers), service providers, and suppliers.

We encourage you to review this information so that you may understand how we collect, use, and share your personal information.

This privacy statement also covers our group of companies. Each group company is a data controller, and company names and information can be found at this link: [Kelly Services, Inc. Company Names and Information](#) (collectively, “**Kelly Services**” or “**Kelly**”). So, when we mention “**Kelly Services**”, “**Kelly**”, “**we**”, “**us**” or “**our**” in this privacy statement, we are referring to the relevant company within our group of companies responsible for processing your personal information. We will let you know which entity will be the controller for your personal data.

Unless otherwise stated, Kelly Services, Inc. is the controller responsible for managing general questions and speculative applications. Those group companies listed above who are not located in the European Economic Area, the United Kingdom and Switzerland can also be contacted through their representatives as listed below in the How to Contact Kelly section.

If we change anything important about this statement (the information we collect, how we use it, or why we use it) we will highlight those changes in the Change History section at the end of this Privacy Statement and provide a prominent link to it for a reasonable length of time following the change and prior to the change taking effect.

If you have questions, please contact the Data Protection Officer at:

**E-mail:** [privacy@kellyservices.com](mailto:privacy@kellyservices.com)

**Post:** Kelly Services, Inc. in the U.S. can be contacted at 999 W. Big Beaver Road Troy, MI 48084.

Contact information for additional countries can be found at this link: [Kelly Services, Inc. Company Names and Information](#).

- [Information We Collect](#)
- [Retaining Your Information](#)
- [Where Your Information May Be Shared](#)
- [Your Rights and Choices](#)
- [How We Transfer Information We Collect Internationally](#)
- [AI Statement](#)

- [Cookies](#)
- [Protecting Your Information](#)
- [Updates To This Privacy Statement](#)
- [How to Contact Kelly](#)

## Information We Collect

Kelly collects, stores, and uses personal data to provide our recruiting, employment, outsourcing, and consulting services. We collect personal data about individuals who use our websites, apply for employment or engagement with us, or placement by us through our recruitment services, employees, and those who are representatives of our customers (including prospective customers). Kelly does not knowingly direct its services or obtain, sell, or share information from children under age 16.

Most of this data is provided by you directly when you contact us, submit an application, attend an in-person recruiting event, through phone conversations, contact us about our services, or during your outsourcing or employment relationship.

We also collect data about individuals who are employed or engaged by our customers in connection with our provision of outsourcing and consulting services to those customers. This is generally obtained through our interactions with customers, suppliers, and service providers.

When you interact with a Kelly website or application, we collect data related to how you interact with that service by, for example, our use of cookies placed on your device.

We have set out further details below on the types of personal data we collect (and have collected in the prior 12 months), store, and use and the reasons we use your personal data.

We may collect, store, and use different types of Personal Data depending on the relevant services such as the following data elements:

- **Identity & Contact Data:** May include name, title, address, e-mail address, telephone number, date of birth, marital status, date of birth, gender, nationality, and photographs, and other similar contact data. This may be information you provide to us as part of the registration process with us when you apply for employment or engage with us to provide recruitment or job-matching services whether provided online, in-person, or by telephone. This may also include information that we receive from our customers and other third-parties about their employees and other personnel we require for the purposes of providing staffing, consultancy, and outsourcing services or information that we collect from individuals representing organizations we engage with.
- **Recruitment Data:** May include any information included in copies of right to work documentation, references, information provided on your résumé or Curriculum Vitae (CV), work-related skills and experience, educational background, qualifications, professional credentials or licenses, membership in a professional organization, career interests or preferences, audio or visual data from interviews, the application form completed by you as part of the application process, and any other information you may give us throughout the recruitment process.

- **Performance and Employment Data:** May include employment records, performance information, disciplinary and grievance information, training and development records, monitoring data (such as CCTV footage, login and access records and IT usage data) salary, and any other information gathered as part of your ongoing employment with Kelly. For additional detail on employee data privacy, internal employees should review relevant internal policies.
- **Characteristics of Protected Classifications:** May include your citizenship and work authorization status, and contents of any other identification provided to Kelly for application or employment purposes.
- **Financial Data:** May include information related to your bank account, tax status, payroll records, tax identification number, social security number, or other financial data.
- **Benefits Data:** May include next-of kin or emergency contact information, annual leave data, benefits selections potentially including health insurance or retirement planning information, disability and health-related information (including that related to a work-related claim such as Workers' Compensation Claim), and information relating to leaves of absence (including sickness or family related leaves).
- **Health Data:** May include information related to physical or mental health conditions, disability status, or health-related work claims (e.g., Workers' Compensation Claim).
- **Monitoring Data:** May include CCTV footage, login and access records, IT usage data including monitoring with applicable Kelly policies.
- **Social Media Data:** May include information from publicly available profiles you have created on social media platforms and job-related platforms such as LinkedIn, Monster, or Indeed.
- **Inferences:** May include inferences drawn from other personal information such as work-related skills or experience.
- **Technical and Location Data:** May include user ID, log-in credentials, password, PIN, GNSS data (e.g., GPS), IP Address, data identifying nearby cellular towers and Wi-Fi hotspots, and information about the use of our IT equipment.
- **Cookies and Similar Data:** As further described in our [Cookie Policy](#), we use cookies, web beacons, pixels, and other similar technologies to recognize and personalize your online experience with Kelly.
- **Communication Data:** May include contact details (email address, social media account details), communication preferences, and details of communications with us (timestamps, mediums used).
- **Screening Data:** May include drug, alcohol, and background checks.
- **Demographic Data:** Information about gender, race, ethnicity, disability, veteran status, ideological views or activities, membership in trade unions.
- **Public Information:** May include information available in the media, information presented on our social media pages or wider social media platforms, or information collected by security systems.
- Any other personal data you may provide to us from time to time.

We may also collect store and use the following **Special Category Data/Sensitive Personal Information**:

- Information about your government-issued identification including your Social Security Number, driver's license, passport, or State ID number.
- Demographic information such as your gender, race or ethnicity, veteran status, or membership in trade unions.
- Information about your health or disability.
- Financial and Benefits Data.
- Screening Data such as criminal offense data.
- In limited circumstances, your Biometric Data, which may be used for biometric identification, such as fingerprint scanning.

### **Recruitment Services**

What Personal Data We Collect: Identity & Contact Data, Recruitment Data, Performance and Employment Data, Characteristics of Protected Classifications, Financial Data, Benefits Data, Social Media Data, Inferences, and Sensitive Personal Information such as Screening Data, Demographic Data, Health Data, or Biometric Data.

Why We Use It: We use this personal data to create, manage, and administer relationships with candidates, assess suitability for employment, match candidates with potential positions, to refer an individual for employment with one of our customers, to employ individuals, and manage employment relationships. We also use it to comply with legal obligations as an employer in connection with the contract of employment, to meet our obligations when we act as an employer, employment agency, recruiter, hirer, or outsourcing or consulting agency, and to comply with other obligations that apply to us under applicable employment laws. Additionally, we use it to detect and prevent policy breaches, support cybersecurity efforts, handle litigation or investigations, and make contact during emergencies.

### Legal Basis for Processing

- Necessary for establishment or performance of a contract (employment)
- Necessary to comply with legal obligations as an employer
- Necessary for exercise of our legitimate interests as an employer
- Necessary to protect vital interests in event of an emergency

### **Information from Customers and Third Parties**

What Personal Data We Collect: Identity & Contact Data, Recruitment Data, Performance and Employment Data, Financial Data, Characteristics of Protected Classifications, and Sensitive Personal Information such as Demographic Data, or Health Data.

Why We Use It: We use this personal data to provide staffing, consultancy, outsourcing, and vendor management services, and for staff administration and operational purposes. This data helps manage employment or outsourcing relationships, detect or prevent any inappropriate behavior or breach of policies, ensure the security of systems and resources, and analyze and improve services provided to customers.

### Legal Basis for Processing

- Necessary for establishment or performance of a contract (employment)
- Necessary to comply with legal obligations as an employer
- Necessary for exercise of our legitimate interests as a provider of staffing, outsourcing, and consulting services

### **Sensitive Personal Information**

What Personal Data We Collect: Government-Issued Identifiers, Screening Data, Health Data, Demographic Data, Financial Data, and Biometric Data

Why We Use It: We use this personal data to comply with statutes, rules, and regulations pertaining to equal employment opportunities and reporting requirements, to administer payments, benefits, and health services, to ensure workplace health and safety, to assess your fitness to work subject to appropriate confidentiality safeguards, to provide appropriate workplace adjustments, to manage sickness absence, and limit access to secure locations or for timekeeping purposes. Additionally, we comply with employment, social security, and social protection laws. Under the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA) (“California Privacy Law”), we only collect and use Sensitive Personal Information for certain limited purposes.

### Legal Basis for Processing

- Necessary for establishment or performance of a contract (employment)
- Necessary to comply with legal obligations as an employer
- Necessary for exercise of our legitimate interests as an employer
- Necessary for carrying out obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection
- Necessary for reasons of substantial public interest
- Data subject has given explicit consent for the processing

### **Information from Individuals Representing Organizations**

What Personal Data We Collect: Identity & Contact Data

Why We Use It: We use this personal data to provide and manage staffing placement, consultancy, outsourcing, and vendor management services, to develop and maintain business relationships, to deliver event and marketing communications, and to improve and develop new services.

### Legal Basis for Processing

- Necessary for performance of a contract with the organization
- Necessary for exercise of our legitimate interests as a provider of staffing, outsourcing, and sourcing services

### **Electronic Network Activity Information**

What Personal Data We Collect: Technical and Location Data, Cookies and Similar Data, or Monitoring Data

Why We Use It: We use this personal data to identify issues with the website or application, manage and administer IT systems and devices, monitor website usage and functionality, to ensure IT system security by monitoring and responding to cybersecurity threats, and for purposes described in further detail in our [Cookie Policy](#). Some website functionalities allow the use of third-party authentication tools (e.g., Facebook, Twitter, Google) to populate fields. By using these tools, you allow us to receive accessible personal data, which may be added to your profile. All IT systems are auditable and monitored as needed, respecting reasonable privacy expectations.

#### Legal Basis for Processing

- Necessary for performance of a contract
- Necessary to comply with legal obligations
- Necessary for exercise of our legitimate interests to ensure IT security

#### **Communication Information**

What Personal Data We Collect: Identity & Contact Data, Communication Data

Why We Use It: We use this personal data to respond to issues or concerns, monitor communications for quality and training purposes, develop new services, improve existing services based on feedback, personalize services, and make necessary disclosures in response to legal requests.

#### Legal Basis for Processing

- Necessary for performance of a contract
- Necessary to comply with legal obligations
- Necessary for exercise of our legitimate interests to interact with individuals

#### **Screening Information**

What Personal Data We Collect: Identity & Contact Data, Screening Data

Why We Use It: We use this personal data to verify an individual's identity, to guard against fraud and other criminal activities, to provide, manage and administer our services, to perform statistical analysis and research, and create holistic profiles for better service personalization.

#### Legal Basis for Processing

- Necessary for establishment or performance of a contract (employment)
- Necessary to comply with legal obligations as an employer
- Necessary for exercise of our legitimate interests to prevent fraud and manage IT security

#### **Incidental Information from Other Sources**

What Personal Data We Collect: Identity & Contact Data, Communication Data

Why We Use It: We use this personal data to maintain market awareness, build and maintain social media presence and branding, and provide security to premises.

#### Legal Basis for Processing

- Necessary for exercise of our legitimate interests to promote business objectives and protect employees

### **Information from Public Social Media Profiles and Employment Websites**

What Personal Data We Collect: Identity & Contact Data, Recruitment Data, or Social Media Data

Why We Use It: We use this personal data to assess suitability for employment, to match candidates with positions, contact individuals about job opportunities, and to refer individuals for employment to customers.

### Legal Basis for Processing

- Necessary for establishment or performance of a contract (employment)
- Necessary to comply with legal obligations as an employer
- Necessary for exercise of our legitimate interests as an employer

If you would like further information on our legitimate interests as applied to your personal information, please contact the Data Protection Officer.

### **Failure to provide information where required**

Where we are requesting information from you in order to employ or engage you, or in order to place or job-match you, if you do not provide the information that we have identified as required we may be unable to properly assist with your request for employment, placement, or job-matching to be performed by Kelly Services.

### **Retaining Your Information**

We will retain your personal information for as long as is necessary in connection with our agreement with you, to provide you with the services requested, for legitimate business reasons or for other necessary purposes such as compliance with a law, regulation, or other legal authority, or as is otherwise permitted to be maintained for other legal purposes, such as audit, security, fraud prevention, or preserving and defending Kelly's legal rights.

Additionally, job applicants and individuals whose assignment has ended will be maintained in Kelly's talent pool to be potentially contacted about other employment opportunities. Individuals located outside of Europe will be retained in alignment with local legal requirements, but in all cases no longer than ten years except as required by law. Where applicable, Kelly will remove your information from the talent pool upon verified request. European talent pools will retain your applicant data for no longer than three years.

Due to our various obligations for retaining records, retention periods may vary. For example, we will retain a copy of your contact details if you object or opt-out of receiving direct marketing communications from us. We will add your details to our suppression list to ensure you do not receive any future marketing communications from us. Also, we will not delete personal data if relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved.

We use the following criteria to determine retention periods:

- how long the data is needed to provide staffing and outsourcing services and operate our business;
- whether there are contractual or legal obligations that exist that require us to retain the data for period of time;
- whether any law, statute, or regulation allows for a specific retention period;
- whether an individual has agreed to a longer retention period;
- whether the data is considered to be sensitive data, in which case a shorter retention period generally would be applied; and
- what the expectation for retention was at the time the data was provided to us.

In all cases, we will continue to protect your personal data in accordance with the terms of this Privacy Statement. We will also routinely refresh our information to ensure we keep it up-to-date.

## **Where Your Information May Be Shared**

Kelly Services holds its employees, agents, and suppliers accountable for maintaining the trust that you place in us with your personal information.

For individuals, Kelly shares the data that is necessary to perform its staffing and outsourcing services with other Kelly Services entities, customers, suppliers, or with service providers that may be engaged to assist in managing the processes required to provide these services.

Any engagement of a customer, supplier, or service provider will be governed by appropriate contractual requirements prohibiting the use of your information for any purposes beyond those specifically directed by Kelly, and requiring that they ensure sufficient administrative and technical security mechanisms are in place to prevent your information from being improperly used, disclosed, or accessed.

In order to provide you the employment and outsourcing services requested by you, or in order to provide our staffing, outsourcing, and consultancy services, we may share your personal data with:

- Our customers or suppliers for potential placement, employment, or outsourcing opportunities.
- Our customers or suppliers who are seeking employees that match your qualifications and profile.
- The company to which you have been assigned to work, in order to integrate with their application and employment processes.
- Managed Service Providers that administer and manage contingent workforce programs for our customers.
- Service providers that perform outsourced administrative services on our behalf, such as applicant tracking systems, human resource information management, payroll processors, and benefit administrators.
- Our information technology vendors, such as Microsoft and Amazon Web Services, for data storage or hosting, business continuity, and disaster relief.



At all times, Kelly shares your personal data with these third parties only for recruitment, placement, employment, and outsourcing purposes.

We also share your information with certain other third parties. We will do this either when we receive your consent or because we need them to see your information to provide services to you or for one of the other purposes set out in this Privacy Statement. These include tax authorities, credit reference agencies, anti-fraud databases and agencies, and screening agencies.

Your personal data may be transferred to other third party organizations in certain scenarios:

- If we discuss selling or transferring part or all of our business – the information may be transferred to prospective purchasers under suitable terms as to confidentiality;
- If we are reorganized or sold, information may be transferred to a buyer who can continue to provide services to you;
- If we're required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority – for example the Police; or
- If we are defending a legal claim your information may be transferred as required in connection with defending such claim.

Our websites, applications, or services may contain links to third-party websites or direct you to third-party platforms as part of our offerings. This Privacy Statement does not address any third-party entity's privacy practices, content, or policies. Once you leave our website or interact with a third-party service, any information you provide is governed by their privacy policies, not ours. We strongly encourage you to review the privacy policies of any third-party websites or services before providing them with your personal information.

## Your Rights and Choices

We respect your right to access and control your information. The amount of personal information you are required to supply when requesting our services is consistent with Kelly's interests in providing our services to you. Kelly complies with applicable data protection laws and regulations.

We process personal data about you for the purposes set out in this Privacy Statement, including to provide recruitment, placement, employment or outsourcing services, operate our business, comply with our legal and contract obligations, and fulfill other legitimate interests of Kelly. In most countries in which Kelly has an employment contract with you, the processing of contact, payroll, and benefit information is a contractual or statutory obligation, and failure to provide information to allow processing may restrict your ability to be employed by Kelly

You may have certain rights in relation to your personal data. The availability of these rights and the ways in which you can use them are set out below in more detail.

**European Privacy Rights:** For individuals located in the European Economic Area ("EEA"), United Kingdom, or Switzerland, Kelly complies with data protection laws in your country, and if applicable, you have the following rights:

- **Access:** You have the right to request access to your personal data. You are entitled to ask us if we are processing your personal data and, if we are, you can request access to your personal data. This enables you to receive a copy of the personal data we hold about you and certain other information about it.
- **Correction:** You are entitled to request that we correct inaccuracies (rectification) of your personal data. In response to your request, we will update any incomplete or inaccurate personal data we hold about you to ensure it is accurate and correct.
- **Erasure:** You have the right to request erasure of your personal data in certain circumstances, and subject to our obligations to maintain your information under applicable laws or if retention of your personal data is required in connection with claims.
- **Restriction:** You are entitled to ask us to suspend the processing of certain of your personal data, for example if you want us to establish its accuracy or the reason for processing it.
- **Transfer:** You may request to receive information you provided to us in a machine-readable portable format or the transfer of certain personal data to another party.
- **Automated decisions:** You may contest any automated decision made about you where this has a legal or similar significant effect and ask for it to be reconsidered. EU residents will not be subject to decisions that will have a legal effect, or a significant impact on you, you based solely on automated decision-making unless it is necessary for the entering into, or for the performance of, a contract with us, or it is based on your explicit consent.
- **Right to object:** For individuals located in the EEA, United Kingdom, or Switzerland, you have a right to object to Kelly processing your information in certain circumstances.

You have a right to object to Kelly's processing of your personal data where this is based on Kelly's legitimate interests (or those of a third party). You may challenge our reliance on legitimate interests. However, we may be entitled to continue processing your personal data based on our legitimate interests or where this is relevant to legal claims. You also have the right to object where we are processing your personal information for direct marketing purposes.

You have the right to lodge a complaint with a Data Protection Authority, in particular in the Member State in the European Union (or United Kingdom and Switzerland, as applicable) where you are habitually resident, where we are based, or where an alleged infringement of Data Protection law has taken place.

Because processing your information is necessary to the performance of recruitment, placement, and employment or outsourcing services that we provide to you, a request to withdraw consent, object to processing, or erase your information may result in Kelly being unable to continue providing its services such as recruitment, placement, employment, or outsourcing services. Subject to applicable law, Kelly may limit or deny requests or charge reasonable fees.

**California Privacy Rights:** For individuals located in California, Kelly is committed to your rights under the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA) ("California Privacy Law"), and wants to ensure you are aware that, if applicable, you have the following rights:

- **Right of Access:** For personal data Kelly has collected or maintained about you in the previous 12 months, you have the right to request access to the categories of personal data we collected about you, the categories of sources from which the personal data was collected, the business or commercial purpose for collecting, selling, or sharing personal data, the categories of third parties to whom Kelly disclosed personal data, and a copy of certain pieces of personal data we

have collected or maintained. Please note that if your access request requires the disclosure of personal information of another individual, we won't be able to comply with all of your access request. Similarly, if responding to your access request would cause us to violate any law, rule, regulation, or law enforcement request, Kelly would not be able to fulfill your request.

- **Right to Correct:** You have the right to request that Kelly corrects inaccurate personal information that is maintained about you.
- **Right of Deletion:** You have the right to request that we delete personal data that we collected from you. However, we are not required to comply with your request if one of several exceptions apply, including circumstances where is necessary for us or our service provider to maintain your personal data in order to complete the transaction with you; internal use that is reasonably aligned with your expectations; compliance with a legal obligation; or other use of your personal data internally that is compatible with the context in which you provided it.
- **Right to Opt-out:** You have the right to opt-out of the Sale or Sharing of your personal data to Third Parties at any time. This means that once you exercise your right to opt-out of the Sale or Sharing of your personal information, we are required to honor your request. We use cookies to provide a more personalized web experience, to analyze our traffic, or to make the site work as you expect it to. While we do not sell your personal information in exchange for monetary consideration, some of our cookie collection practices such as targeted or cross-context advertising may be considered a "Sale" or "Sharing" of personal information. To opt-out of the Selling or Sharing of your personal information, visit our website and click the [Do Not Sell or Share My Information](#) link; the cookie consent banner will appear. To opt out of the Selling or Sharing of Personal Data, choose "Deny" on the cookie consent banner. This will ensure the site will not collect non-necessary cookies. You may also adjust the privacy settings on your browser by enabling Global Privacy Control. If Global Privacy Control is enabled to opt-out of the Selling or Sharing of Personal Data, Kelly's sites will detect this signal.
- **Right to Limit Use and Disclosure of Sensitive Information:** You have a right to request that Kelly restricts its use and disclosure of your sensitive personal information. However, Kelly does not use or disclose your sensitive personal information except for those purposes authorized by California Privacy Law.
- **Right not to be discriminated against for exercising these rights:** You have the right to be free of discrimination for exercising your consumer privacy rights. We will not deny you goods or services, charge different amounts or provide a different quality level of goods or services for exercising your rights unless the difference is reasonably related to the value of your data.
- **Automated Decision-Making Rights:** You have the right to opt-out of automated decision-making technology for covered systems in most circumstances. You also have the right to request certain information about our use of automated decision-making technology.

Because processing your information is necessary to the performance of recruitment, placement, and employment or outsourcing services that we provide to you, a request to erase your information may result in Kelly being unable to continue providing its services. Subject to applicable law, Kelly may limit or deny requests or charge reasonable fees.

#### Exercising Your California Privacy Rights

To exercise any of these rights afforded under the California Privacy Law, please use one of the following methods:

- Call 1-866-Kelly4U (1-866-535-5948)
- Access our [Data Subject Rights Page](#)
- Email [privacy@kellyservices.com](mailto:privacy@kellyservices.com)

Please note, Kelly may require information to confirm your identity before verifying the request. If we are unable to verify your identity, we may deny the request as permissible under applicable law.

**Mexican Privacy Rights:** Kelly Services México, S.A. de C.V., and its subsidiaries in Mexico, hereinafter “KELLY”, domiciled at Ave. Niños Héros Number 1555, interior 103, Moderna Neighborhood, Zip Code 44190, Guadalajara, Jalisco, and with its webpage address at [www.kellyservices.com.mx](http://www.kellyservices.com.mx) is responsible for the use of general, financial, patrimonial, or sensitive personal data that you have disclosed or may come to disclose in connection to your employment relationship with Kelly, or with the job application you provided, if any, pursuant to the terms established by the Mexican Federal Law for Protection of Personal Data in Possession of Private Parties (“LFPDPPP”).

You are entitled to limit the use or disclosure of your personal data for those purposes not required for our legal relationship, to avoid receiving job offers or promotional messages from KELLY to your phone number, mobile phone number, and/or e-mail address, expressing your refusal to continue receiving this type of messages through your e-mail by sending us such request to the following e-mail: [ARCO@kellyservices.com](mailto:ARCO@kellyservices.com). In addition to the foregoing, we inform you that at any time, you may revoke your authorization for the use of your personal data by sending an e-mail to [ARCO@kellyservices.com](mailto:ARCO@kellyservices.com).

In accordance with the LFPDPPP, you are entitled to access your personal data in KELLY’s possession as well as to obtain details about their use, rectify them in case they are inaccurate or incomplete, cancel them when you consider that they turn out to be excessive or unnecessary for the purposes that justify their gathering, or oppose to their use for specific purposes (ARCO rights).

In order to allow KELLY to process your request, such request e-mail should be accompanied by the following information: (i) copy of official identification with photograph (IFE, current passport, professional certificate or military card), (ii) full name, (iii) complete current domicile, (iv) fixed and/or mobile phone number and (v) the reasons for requesting Kelly to access (whenever you want Kelly to inform you about the existence of your personal data); to rectify (whenever you want Kelly to rectify your personal data as they may be inaccurate or incomplete); to cancel (whenever you want Kelly to partially or completely eliminate your personal data); or to oppose (when you require Kelly to cease the use of your personal data).

In the event your request is authorized, in terms of the LFPDPPP, the return of the personal data will be free of charge, and you will have to pay the reasonable mailing expenses only or the cost of copies or other formats that are generated. Your request will be attended within a period no greater than 20 (twenty) days.

If you consider that your right to data privacy has been infringed by any conduct of employees or by our actions or responses or you believe that there is a violation to the provisions established by the LFPDPPP regarding the use of your personal data, you may submit a complaint or a claim before the Federal Institute of Access to Information and Data Protection. For further information visit [https://home.inai.org.mx/?page\\_id=3374](https://home.inai.org.mx/?page_id=3374).

**Other Privacy Rights:** Under the laws of some jurisdictions you may have the right to request additional information about the personal data we collect, request access to the personal data we process, correct an error or omission, delete personal data, or object or limit further processing. Kelly adheres to applicable data protection laws, and will respect individual rights requests under those laws.

Because processing your information is necessary to the performance of recruitment, placement, and employment, or outsourcing services that Kelly provides to you, a request to exercise certain rights may result in Kelly being unable to continue providing its services such as recruitment, placement, employment, or outsourcing services. Subject to applicable law, Kelly also may limit or deny requests or charge reasonable fees.

**Direct Marketing:** We may periodically use your contact information to send you updates via e-mail in order to alert you to opportunities or services relevant to your interactions with us, such as jobs in our database that match your selected criteria.

At the point where we request personal information about you, our site also gives you the opportunity to decide which communications you wish to receive. When your interactions with Kelly Services have resulted in your registration for multiple services or resources it may be necessary to opt out from each service separately. Except as authorized by individuals or as identified in this Privacy Statement, phone numbers and SMS consent will not be shared with third parties, vendors, or any other entity for marketing purposes.

You can opt-out of receiving direct marketing from us at any time. Each marketing communication will provide instructions on how to opt out of receiving similar e-mails from the registered service or resource. You can also opt-out by contacting the Data Protection Officer at [privacy@kellyservices.com](mailto:privacy@kellyservices.com) or by changing your communication settings associated with your account.

## **How We Transfer Information We Collect Internationally**

### **International Transfers of Information We Collect**

We collect information globally and may transfer, process, and store your information outside of your country of residence, to wherever we or our third-party service providers operate for the purpose of providing you the services. Whenever we transfer your information, we take steps to protect it.

**International Transfers Within Kelly Services:** To facilitate our global operations, we transfer information globally and allow access to that information from countries in which the Kelly owned or operated companies have operations for the purposes described in this privacy statement. These countries may not have equivalent privacy and data protection laws to the laws of many of the countries where our customers and users are based. When we disclose information about you within and among Kelly Services, we engage a variety of legal mechanisms, including contracts such as the standard contractual data protection clauses, which have been approved and published by the European Commission under Commission Implementing Decision 2021/914, to safeguard the transfer of information we collect from the European Economic Area, the United Kingdom (the "UK"), and Switzerland.

**International Transfers to Third Parties:** Some of the third parties described in this privacy statement, where services are provided under a contract, are based in other countries that may not have equivalent privacy and data protection laws to the country in which you reside. When we disclose information of

data subjects in the European Economic Area, the UK, or Switzerland, we make use of the European Commission-approved standard contractual data protection clauses, or other appropriate legal mechanisms to safeguard the transfer.

### **Data Privacy Framework Notice**

In order to ensure transfers of personal information from the European Union, United Kingdom or Switzerland to the U.S. are done in a secure and compliant manner, Kelly is a participant in the EU-U.S. Data Privacy Framework (EU-U.S. DPF), including the UK Extension to the EU-U.S. DPF and Swiss-U.S. Data Privacy Framework (Collectively the “DPF”). If there is any conflict between the terms in this Privacy Statement and the DPF, the DPF Principles shall govern.

As a participant in these programs, Kelly self-certifies annually its continued commitment to uphold the DPF Principles for all data received from the EU, the UK (and Gibraltar) or Switzerland in reliance on the DPF, and to be subject to the investigatory and enforcement powers of the United States Federal Trade Commission (FTC). To learn more about the Data Privacy Framework, and to view our certification, visit the [U.S. Department of Commerce’s Website](#).

Kelly provides individuals with the ability to resolve complaints or make inquiries directly with the company by contacting [privacy@kellyservices.com](mailto:privacy@kellyservices.com) or through other methods outlined in the section titled How to Contact Kelly.

For any disputes which cannot be directly resolved with the company, Kelly agrees to provide access to an independent dispute resolution body designed to address the privacy-related complaints of EU and as applicable, the United Kingdom or Swiss data subjects at no cost.

- For inquiries or complaints related to Human Resources Data, Kelly Services will cooperate with EU Data Protection Authorities, the UK Information Commissioner’s Office and the Swiss Federal Data Protection and Information Commissioner (collectively, “Data Protection Authority”) in the investigation and resolution of unresolved complaints concerning our reliance on the DPF, including complying with advice given by Data Protection Authorities (as described in the Data Privacy Framework Principles). Individuals may contact their Data Protection Authority directly to resolve disputes.
- For inquiries or complaints not related to Human Resources Data, Kelly has established an independent recourse mechanism, the International Centre for Dispute Resolution, the international division of the American Arbitration Association (“ICDR/AAA”). The ICDR/AAA can be contacted for resolution of the issue by visiting <http://info.adr.org/safeharbor>.

Under certain conditions, more fully described on the [Data Privacy Framework website](#), including when other dispute resolution procedures have been exhausted, you may invoke binding arbitration.

Additionally, we remain liable under the DPF Principles if our processor processes personal data in a manner not consistent with the DPF Principles, unless we demonstrate that we are not responsible for the unauthorized processing.

### **Artificial Intelligence Statement**

We leverage artificial intelligence (AI) technologies in various areas of our business to provide enhanced services and improve efficiency for our employees, customers, and talent. The use of AI may include the following areas:

- **Human Resources:** Supporting recruitment and talent management processes by pre-screening documents, identifying relevant information, or refining search and filtering activities to assist in matching individuals with opportunities;
- **Internal Operations:** Assisting with daily tasks involving documents, images and other content (e.g. creating summaries, translations, content generation), facilitating information searches in databases and online, aiding in business operations, management, and development, and enhancing task prioritization and workflow automation;
- **Security, Combating Abuse:** Detecting suspicious activity in emails (e.g. malware), communications, transactions, or in our networks;
- **Customer Care:** Efficiently addressing inquiries (e.g. chatbot), documenting customer interactions (e.g. by creating transcripts, logs, or summaries) analyzing these interactions to improve quality, and assisting in communications (e.g. drafting emails);
- **Data Analytics:** Analyzing data (e.g. transactions, website usage) to identify patterns or purposes such as market research, product development, AI model training, or for personalizing content to align with individual interests; and
- **Development:** Programming software, generating data for product testing, detecting defects, and utilizing virtualization in product development.

We have regulated the use of AI internally through our policies and procedures, comply with applicable AI legislation, and ensure appropriate human supervision where important matters are concerned. Where we offer engagement with AI-driven dialogues, we will clearly disclose the involvement of AI.

If you have any AI related questions, incidents or requests, please contact: [privacy@kellyservices.com](mailto:privacy@kellyservices.com)

## Cookies

We use “cookies” or similar tracking technologies to improve your browsing experience.

Cookies are small data files containing information placed on your device when you visit a website. Cookies may help recognize returning website visitors and transmit data back to the original site, or to another site that recognizes the same cookie. This data may include Technical and Location Data, Cookies and Similar Data, and Communication Data (as defined above). These technologies are often used to enhance website functionality, improve user experience, and provide information to website owners. We collect the following types of cookies:

**Necessary:** These are required to make our websites and apps usable by enabling basic functions like page navigation, security, and accessibility. The website cannot function properly without these cookies and if you disable these by changing your browser settings, this may affect how our websites function.

**Preferences:** These cookies enable our websites to remember information that changes the way the website performs, such as your preferred language.

**Statistics:** These help us understand how website visitors interact with the site.

**Marketing:** These cookies may track visitors across websites and are used to display relevant advertisements to website users.

Under certain privacy laws, the collection of data through third-party cookies for targeted or cross-context behavioral advertising may be considered a “Sale” or “Sharing” of personal information. To

change your cookie settings, or to opt-out of the Selling or Sharing of your personal information, visit our website and click the [Do Not Sell or Share My Information link](#); the cookie consent banner will appear. From here, you can select which cookies you would like to enable (if any). To opt out of the Selling or Sharing of Personal Data, choose “Deny” on the cookie consent banner. This will ensure the site will not collect non-necessary cookies. You may also adjust the privacy settings on your browser by enabling Global Privacy Control. If Global Privacy Control is enabled to opt-out of the Selling or Sharing of Personal Data, Kelly’s sites will detect this signal.

For more information about cookies, the types of cookies we use, and how we use them, please see our [Cookie Policy](#).

## **Protecting Your Information**

Kelly Services takes care to secure your personal information. We regularly monitor industry standards for securing information and review our physical, technical, and organizational security practices to determine how best to prevent the loss, misuse, alteration, unauthorized access, destruction, or disclosure of your personal information. Any personal data sent to us, either in writing or e-mail, may be insecure in transit and we cannot guarantee its delivery. Passwords must be kept confidential and not disclosed to a third party. Kelly does not ask you for your password.

## **Updates to this Privacy Statement**

Kelly may update this Privacy Statement from time to time, so please review it frequently.

If we change our Privacy Statement, we will post the revised version here and will describe the changes in the [Change History](#) section.

If we make significant changes to our Privacy Statement, we may also notify you by other means prior to the changes taking effect, such as, prominently posting a notice of such changes on our websites, providing notice of the change through our online portals, or by directly contacting you.

If you would like to access previous versions of this Privacy Statement, contact the Data Protection Officer at [privacy@kellyservices.com](mailto:privacy@kellyservices.com).

## **How to Contact Kelly**

If you have any questions or comments about this Privacy Statement, would like to exercise any of your rights under applicable data protection law, or believe that Kelly has not adhered to this Privacy Statement, please e-mail our Data Protection Officer at [privacy@kellyservices.com](mailto:privacy@kellyservices.com). Additionally, individuals can contact Kelly Services in the U.S. at:

Kelly Services, Inc.  
ATTN: Privacy Officer  
999 W. Big Beaver Road  
Troy, MI 48084

To find the Kelly entity in your country or region, refer to the [Kelly Services, Inc. Company Names and Information](#).

Or in the EEA, United Kingdom, or Switzerland at:



Kelly Services Management Sàrl  
ATTN: Privacy Officer  
Av. Edouard-Dubois 20  
CH-2002  
Neuchâtel  
Switzerland

Those group companies listed who are not located in the European Economic Area, the United Kingdom, and Switzerland can also be contacted through their representatives:

**European Economic Area:** Kelly Managed Services (Nederland), B.V., Neptunusstraat 37, 2132 JA Hoofddorp, Netherlands.

**United Kingdom:** Kelly OCG UK Ltd, 2a Hollinswood Court, Stafford Park 1, Telford, United Kingdom, TF3 3DE

**Switzerland:** Kelly Services Management Sàrl at Av. Edouard-Dubois 20, CH-2002 Neuchâtel, Switzerland.

[Print Document](#)

## Change History

December 2024

- We reformatted some of the information regarding the “Information We Collect” to eliminate the table and streamline the presentation of this information.
- We added the “Artificial Intelligence Statement” to provide information regarding our use of AI.
- We updated the “Information We Collect” section, “California Privacy” section, and the “Cookies” section to further explain our use of cookies and similar technologies, including how to opt-out of the Sale or Sharing of Personal Information.

July 2024

- In [“Kelly Services, Inc. Company Names and Information”](#) we updated the list of entities.

April 2024

- In [“Kelly Services, Inc. Company Names and Information”](#) we updated the list of entities.

September 2023

- We reformatted some of the information regarding international data transfers in “Where Your Information May Be Shared” into a new section titled “How We Transfer Information We Collect Internationally.”
- We added information to the “How We Transfer Information We Collect Internationally” to provide information about our compliance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), including the United Kingdom Extension and Swiss-U.S. Data Privacy Framework (Collectively the “DPF”).

March 2023

- In “Information We Collect” we clarified the categories of Personal Data we collect, the Legal Basis for Processing the categories of Personal Data, and information about automated processing.
- In “California Privacy Rights” we updated the information regarding exercising your rights under California law.
- We updated the address in Switzerland.
- In [“Kelly Services, Inc. Company Names and Information”](#) we updated the list of entities.

February 2021

- We removed references to EU/US Privacy Shield, including the section outlining the arbitration options available under the Privacy Shield program.

July 2019

- We updated the Privacy Statement to include references to the California Consumer Privacy Act.
- We updated the Privacy Statement to clarify applicability to Kelly employees.

March 2019

- We updated the Privacy Statement to inform individuals that we do not collect information related to minors under age 13.
- We updated our Privacy Statement to include references to the United Kingdom separate from references to the European Union or European Economic Area.
- We updated our representative for group countries who are not located in the European Union to our entity located in the Netherlands.

#### May 2018

- We updated the Privacy Statement to provide a more layered presentation of information.
- In “Information We Collect” we presented the information in a more user-friendly format.
- We renamed “How We Use the Information” to “Why We Use the Information” and provided additional transparency on Kelly’s use of the information, including easier category groupings.
- We separated out and added information about the standards we use to determine how long data is maintained. This information is now in a separate section called “Retaining Your Information.”
- In “Your Rights and Choices” we created easier groupings for privacy rights based on specific jurisdictions, and provided notification and additional transparency for the rights of those located in the EEA or Switzerland.
- In “Where Your Information May Be Shared” we provided additional transparency regarding the potential countries or areas where information may be shared.
- We developed and deployed a separate [Cookie Policy](#) to inform you about our use of cookies.
- In “Updates to this Privacy Statement” we provided additional clarification on how we would provide notice of significant changes to this Privacy Statement.
- We created a Change History section to show updates to this Privacy Statement.
- We made minor edits for clarity and grammar.

#### April 2017

- We updated the Privacy Shield section to provide information about our compliance with the Swiss-U.S. Privacy Shield Framework.

#### November 2016

- In “Where Your Information May Be Shared” we added additional transparency regarding our responsibility for our processor’s actions.

#### August 2016

- We updated “Safe Harbor” to “Privacy Shield” and provided information about our compliance with the EU-U.S. Privacy Shield Framework.