

## **Volt Information Sciences, Inc. Privacy Policy**

Effective Date: May 10, 2019

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This Privacy Policy discloses practices for collection, use and protection of your personal information by Volt Information Sciences, Inc. and its subsidiaries, affiliates, and divisions (hereinafter collectively the “Company”). The Company operates in accordance with the EU Data Protection Directives 95/46/EC and 2002/58/EC as amended and updated (the “Directives”) as appropriate to the jurisdiction in which Company is trading.

### **Personal Information the Company Collects**

In the course of its business, the Company collects personal information, which was given to or made available to the Company for an intended business function or purpose. The information may include a name combined with a unique identification number, including a social security and/or national identification number, home address, mailing address, e-mail address, social media identifier, driver’s license number, birthdate, country location, personal home, or cell/mobile telephone number(s), historical work or education information, compensation/benefits/pay rates, bank account information, pricing, medical or claims information and/or performance data (hereinafter collectively referred to as “Personal Information”).

### **Use and Disclosure of Your Personal Information**

Personal Information is used in connection with the Company’s business, including providing recruitment, placement, and employment services to our employment candidates, employees, customers and for other lawful purposes.

The Company does not disclose Personal Information except in the following instances:

- With the subsidiaries and affiliates within the Company, as needed;
- With your express consent;
- Where permitted and/or required by our customer/client agreements, including for billing purposes;
- To facilitate job opportunities for our candidates;
- With third party entities, vendors, consultants, agents and/or other service providers engaged to handle or manage some or all of the Personal Information on our behalf, who shall be required to protect Personal Information from dissemination and/or use;
- When we believe disclosure is appropriate to prevent physical harm or financial loss and/or when reasonably necessary to an investigation of suspected or actual illegal activities;
- When required and/or otherwise permitted by law;
- In response to lawful requests by public authorities, including to meet national security or law enforcement requirements;
- If you are a customer/client, the Company may share information with third parties, such as with a credit bureau or agency; and
- In connection with any merger, sale of Company assets or acquisition of all or a portion of the Company’s business or with respect to any Company financing.

### **Data Processing Outside Your Country**

We may transfer your information and process it outside your country of residence to wherever Company or our clients or our third party data processors operate.

## **Privacy Shield**

With respect to Personal Information associated with individuals located in European Economic Area (EEA) countries (“EEA Data Subjects”), the Company complies with the Data Protection Directive 95/46/ec as amended. For a list of the U.S. subsidiaries that adhere to the Privacy Shield principles, please reference our Privacy Shield registration at <https://www.privacyshield.gov/list>.

To the extent that Personal Information of EEA Data Subjects is transferred to the United States of America, the Company complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Information transferred from the EEA to the United States. The Company remains responsible for personal information that is shared under the Onward Transfer Principle with third parties for external processing on Company’s behalf.

The Company has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit [www.privacyshield.gov](http://www.privacyshield.gov).

Notice of material changes to the use or transfer of your Personal Information incompatible with the purpose for which it was originally collected will be provided through our website or by other means so that you may review the changes before you continue your relationship with the Company. If you object to the changes, you must notify of us of your wish to sever your relationship with the Company; otherwise, your continuance of the relationship after the notice means that you are consenting to the changes.

The Company is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission to ensure compliance with the EU-US Privacy Shield principles outlined in this Privacy Policy.

In compliance with the EU-US Privacy Shield Principles, the Company commits to resolve complaints about your privacy and our collection or use of your personal information. JAMS will be the US-based independent organization responsible for reviewing and resolving complaints about our Privacy Shield compliance. We ask that you first submit any such complaints directly to us via [Privacy@volt.com](mailto:Privacy@volt.com). If you are not satisfied with our response, please contact JAMS at <https://jamsadr.com/eu-us-privacy-shield>. In the event your concern still is not addressed by JAMS, you may be entitled to a binding arbitration under Privacy Shield and its principles.

The Company commits to cooperate with EU data protection authorities (DPAs) and comply with the advice given by such authorities with regard to human resources data transferred from the EU in the context of the employment relationship.

## **Solicitations and/or Marketing Contacts**

The Company does not sell, convey and/or communicate customer/client, business associate, supplier, vendor, employee and/or candidate Personal Information to third parties for purposes of direct mail, telemarketing, and/or related promotions, solicitations or marketing contacts.

## **Management of Personal Information**

The Company uses a combination of reasonable security technologies, policies and procedures, and non-disclosure, confidentiality and/or other forms of agreement(s) to help protect your Personal Information from unauthorized access, destruction, use, modification or disclosure. In the event that local law in the country of disclosure or use of Personal Information is more stringent than the requirements set out in this policy, local law will prevail over this policy to the extent necessary to meet the requirements of that legislation.

## **Changes to our Privacy Policy**

The Company, in its sole and absolute discretion, reserves the right to supersede, modify, supplement, replace or eliminate this Policy, which shall be effective upon publication on the Company's website.

## **Requests to access and to make changes in Personal Information**

In the event that any individual wishes to access, change, correct or delete Personal Information and its treatment as covered by this Privacy Policy, he or she must submit a written request to [privacy@volt.com](mailto:privacy@volt.com). You have the right to request that usage or disclosure of your information be limited, however such usage of your information as described above may be necessary for the performance of recruitment, placement, and employment services that we provide to you. As such, a request to withdraw consent, object to processing, limit usage or erase your information may result in Volt being unable to continue providing its services such as recruitment, placement or employment services.

## **Who to Contact About this Privacy Policy**

Any questions or complaints regarding the Company's Privacy Policy should be directed to:

Volt Information Sciences, Inc.  
959 Route 46 East, Suite 201  
Parsippany, NJ 07054  
Attn: Vice President Risk Management  
[Privacy@volt.com](mailto:Privacy@volt.com)