

Background

On May 25, 2018, a new privacy law went into effect in the European Union (EU) and the European Economic Area (EEA) called the General Data Protection Regulation or the GDPR. The GDPR expands privacy rights granted to individuals in the EU and the EEA and imposes obligations on organizations that control, process and maintain the personal data of such individuals. The GDPR may apply to certain activities of CDI Corporation and its related companies (collectively referred to in this Privacy Statement as “CDI”, “we” or “our”) even though CDI’s business is located in the United States and Canada.

Objective and Scope of this Policy

CDI is committed to compliance with the GDPR when it is applicable to us. This Privacy Statement is intended for the benefit of, and will *only* apply to, persons entitled to rights under the GDPR, namely persons residing in the EU, EEA or Switzerland (sometimes referred to in this Privacy Statement as “you” or “your”). This Privacy Statement is in addition to CDI’s U.S. Policy on Privacy of Personal Data and CDI’s Canadian Policy on Privacy of Personal Data. This Privacy Statement provides information about our practices for gathering, storing and using the personal data of applicable individuals who apply for or use our staffing, employment or outsourcing services, use our websites, and those who are representatives of our customers, service providers and suppliers.

Statement of Policy

CDI respects your privacy and we acknowledge that you have certain rights related to any personal data we collect from you and that we have certain obligations regarding that data, as set forth in the GDPR and this Privacy Statement.

Information We Collect

CDI collects, stores and uses personal data in order to provide our staffing, recruiting, employment, outsourcing and consulting services. We collect personal data about individuals who apply for employment or engagement by us or placement by us through our staffing services, or who use our website for those purposes. This data enables us and our customers to consider you for employment or engagement opportunities and to operate our business and to service our customers.

Most of this data is provided by you directly when you contact us about our services, submit a resume or application, attend a recruiting event, or through email and phone conversations with us, or during your employment or other business relationship with us.

Examples of personal data include, but are not limited to:

- name and contact information (such as email address, mailing address and phone number);
- date of birth;
- gender;

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- education, work history and qualifications;
 - citizenship and work authorization status;
 - identification data such as your driver's license, passport or other government-issued identification numbers and the contents of such documents;
 - job-related social media data, such as profiles you've created on job-related social media platforms and job boards (for example, LinkedIn, Monster and Indeed);
 - screening data, including drug, alcohol and criminal background checks;
 - the identify of your references and information provided by them ;
 - bank account, financial and employee benefits data; and
 - information about physical or mental health, disability status and leaves of absence

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

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

European Data Privacy Rights

For individuals located in the EU, EEA or Switzerland, to the extent provided in the data protection laws of your country, 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, subject to (a) our obligations to maintain your information under applicable laws, (b) if retention of your personal data is required in connection with claims, or (c) for other reasons expressly set forth in this Privacy Statement.
- *Objection:* You have a right to object to us processing your personal data in certain circumstances. 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 may challenge our reliance on legitimate interests.

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- *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.

To exercise any of these rights, please send an email to CDIGDPRrequests@cdicorp.com.

If we fail to comply with these rights, you have the right to lodge a complaint with an applicable supervisory authority, in particular in the EU Member State where you are habitually resident or where an alleged infringement of data protection laws has taken place.

Because processing your information is necessary to the performance of staffing, 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 CDI being unable to continue providing its services to you. Subject to applicable law, CDI may limit or deny requests or charge reasonable fees.

Why We Use Your Information

We will use your personal data where:

- you have provided the data to us for the purpose of being considered for employment and engagement opportunities and we use the data for that purpose;
- it is necessary for the performance of and compliance with your employment contract or other applicable engagement contract with us or in order to take steps prior to entering into that contract or another contract with you;
- you have given your consent to the relevant processing activity for the purposes of which we have informed you (where this is the case, you always have the right to withdraw that consent);
- we need to process your information in order to comply with a legal or regulatory obligation (for example, complying with our duties under employment, social security, social protection, tax legislation equality legislation or in connection with statutory sickness or maternity rights);
- it is necessary for the establishment, exercise or defense of legal claims;
- in rare circumstances when it is necessary for vital interests relating to you or another person (for example, avoiding serious risk of harm to you or others);

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- it is necessary for our legitimate interests (or those of a third party), provided that our legitimate interests are not overridden by your interests or rights which require protection of your data; or
 - where you have already made the relevant personal data public.

We will only use your personal data for the purposes for which we collected it, unless we reasonably determine that we need to use it for another reason as described in this Privacy Statement or as required or permitted by law.

Legitimate Interests

As mentioned above, we can sometimes use your personal data where this is necessary for our legitimate interests (or those of a third party). This includes where use of your personal data is necessary to:

- consider you for employment or engagement opportunities with us or our customers;
- ensure effective administration and management of your employment or engagement, benefits, management of the business and business continuity;
- check that you are legally entitled to work, manage performance, discipline and promotion processes;
- manage training and development requirements;
- ensure we can contact you or your family in the case of an emergency;
- prevent fraud and financial crime;
- ensure network and information security;
- prevent, detect or investigate unauthorized use of our systems and ensure we comply with the law and our policies;
- maintain product and service development and enhancement, along with effective marketing through analytics and profiling for business intelligence;
- deal with disputes and accidents and take legal or other professional advice;
- ensure our assets are protected, kept confidential and not used for inappropriate or unlawful purposes; and

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- comply with another country's laws and regulations.

Retaining Your Information

We will retain your personal data for as long as is necessary in connection with our agreement with you, to provide you with the services requested, 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 CDI's legal rights.

Due to our various obligations for retaining records, retention periods will vary. We consider the following criteria in determining the applicable retention period:

- how long the data is needed to provide staffing and other services and to operate our business;
- whether there are contractual or legal obligations that exist which require us to retain the data for a particular 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.

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.

Where Your Information May Be Shared

CDI shares the personal data that is necessary to perform its staffing and outsourcing services with other CDI 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 which typically (a) prohibit the use of your information for any purposes beyond those set forth in our contract with the other party, and (b) require the other party to have sufficient administrative and technical security mechanisms in place to prevent your information from being improperly used, disclosed or accessed.

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

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- our customers, suppliers or prime contractors for potential placement, employment, engagement or outsourcing opportunities;
- our customers, suppliers or prime contractors 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; and
- our information technology vendors for data storage or hosting, business continuity and disaster relief.

CDI shares your personal data with these third parties only for recruitment, placement, employment and outsourcing purposes and for other purposes described in this Privacy Statement.

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 screening agencies.

The sharing of your information with other CDI entities, service providers, suppliers and customers will likely result in your data being sent to countries outside of your country of residence, which may have data protection laws that differ from those in your country of residence. The geographic areas in which such recipients are located will vary based on the nature of the services, but are expected to be primarily in the United States and Canada. Regardless of the source or destination location of your information, CDI will protect your information as described in this Privacy Statement, and abide by all applicable data protection laws.

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;

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- if we are required to by law 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.

Direct Marketing and Communications

We may periodically use your contact information to send you updates via email 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.

You can opt out of receiving direct marketing from us at any time by either (a) following the instructions on how to opt out in the particular marketing communication you receive, or (b) contacting CDI at the email address set forth at the end of this Privacy Statement.

Cookies

We may record the number of visitors to various sections of our website and track movement between the sections by means of “cookies.” Cookies are small data files containing information placed on your computer or other electronic device and are automatically downloaded to your device in order to recognize you as someone that has visited our website previously. We use cookies that identify your browser or device. They collect and store information when you visit our website about how you use it.

How to Contact CDI

If you wish to exercise any of your rights under this Privacy Statement or the GDPR, please send an email to CDIGDPRrequests@cdicorp.com.

If you have any questions about this Privacy Statement or believe that CDI has not adhered to this Privacy Statement, please send an email to privacy@cdicorp.com. Also, you can contact us at:

CDI Corporation
1735 Market St., Suite 200
Philadelphia, PA 19103
Attention: Chief Compliance Officer