

PRIVACY AND DATA SECURITY STATEMENT

Thank you for visiting South East Employee Leasing Services, Inc. online and mobile resources, and for viewing this privacy and data security statement. Our privacy statement, contained in the pages that follow, serves to give notice about the types of personal information we collect, how we use it, who we share it with and why, and what we do to try to protect it. We delve into those matters in a fair amount of detail in the pages that follow. We encourage you to read them carefully. In the meantime, we provide a quick overview below.

Summary of how we handle Personal Information

◆ What do we collect?

We collect and retain certain personal information from a variety of different data subjects. Our privacy statement applies mostly to those who visit and use our online and mobile resources, from whom we collect very little information unless it is voluntarily submitted to us. You can read [here](#) to learn about the categories of personal information we collect from all four groups of data subjects.

◆ Why do we use it?

We use personal information received from visitors and users of our online and mobile resources to communicate directly with them. We provide further detail about our use of personal information [here](#).

◆ When do we share it?

We share personal information when needed to fulfill our legal obligations and when our vendors and business partners and affiliates need it to perform under the contracts we have with them. We provide further detail about our sharing of personal information [here](#). We do not sell or rent any personal information from any group of data subjects to third party data brokers or marketing companies.

◆ How do we protect it?

We've invested in a Security Program that addresses both technical and operational matters. Our program includes incident response and management and vendor oversight components. You can read about those components [here](#) and [here](#).

◆ Your Privacy Choices and Rights

You do not have to provide personal information to enjoy most of the features of our online and mobile resources. Moreover, you can opt out of certain activities like newsletters and announcements. You can learn more about that [here](#).

Contacting Our Privacy Office

If you have any questions about our privacy and data security policies, procedures and practices, including anything we say in this privacy statement, we encourage you to contact our Privacy Office.

- ◆ **Address:** PO Box 1457, Tarpon Spring, FL 34688
- ◆ **Email:** morgan.l@spli.com
- ◆ **Phone:** (727) 682-1072

This privacy statement was amended as of December 11, 2020 and is effective as of that date. The English language version of this privacy statement is the controlling version regardless of any translation you may attempt.

NAVIGATING THROUGH THIS STATEMENT

You can use the links below to navigate to areas of this statement that apply specifically to you, or which may otherwise be of interest:

[Some Important Vocabulary](#)
[What Personal Information Do We Collect?](#)
[How Do We Use the Personal Information We Collect?](#)
[When/With Whom Do We Share Personal Information?](#)
[How Do We Protect Collected Personal Information?](#)
[Your Rights And Options](#)
[Children's Privacy](#)
[Submitting Information From Outside the United States](#)
[The California Consumer Privacy Act](#)
[The EU General Data Protection Regulation](#)
[Changes To This Privacy Statement](#)
[Contacting Us](#)

SOME IMPORTANT VOCABULARY

Although not itself a contract, this privacy statement is an important document that explains how we address some of our legal obligations, and your related legal rights, involving personal information. Clarity is therefore important. We'll use this section to let you know about some words that have special meanings whenever you see them in this statement. Let's start with the word "**statement**" itself: when we reference "**this statement**", "**this privacy statement**" and "**our statement**", we mean the Privacy and Data Security Statement you are reading now. Wherever we say "**Company**", "**we**", "**us**", or "**our**", we mean South East Employee Leasing Services, Inc. We use the words "**you**" and "**your**" to mean you, the reader, and other visitors to our online and mobile resources who are, in all cases, over the age of 18. This age requirement is discussed in more detail later in this statement [here](#).

When we talk about our "**online and mobile resources**", we mean all websites, portals or other features we operate to allow you to interact with us and our systems, as well as the mobile apps we've created and distributed to let you interact with the content we provide. An "**affinity action**" is when you "follow" us, "like" us or take a similar or analogous action on our external social media presence. Finally, and perhaps most importantly, when we refer to "**personal information**", we mean information that can be used to identify or easily be linked to you.

WHO DO WE COLLECT PERSONAL INFORMATION FROM?

We collect personal information from four groups of data subjects:

- visitors to, and users of, our online and mobile resources
- current members of our workforce and those who apply for posted jobs
- our third party vendors and business partners
- our customers and their workforce members

The categories of information we collect from each of these groups, and the ways in which we use it, differs. As you may have noticed, it's possible that the same person could fall into more than one group. For instance, someone who works for us might, on their day off, visit one of our general websites. Most of this statement addresses our processing and sharing of personal information collected from visitors to and users of our online and mobile resources. The immediately following paragraphs provide a quick summary overview about everyone else.

Our Customers

Typically, the categories of personal information collected from our customers and their workforce will include identifiers (such as name) and demographic information. We use that information to perform our

services on their behalf. Our customers enter into contracts with us. That contract is separate from this statement and has its own terms and conditions for notice of collection of personal information and governing our overall confidentiality, data privacy and data security obligations. As a result, those terms, and not this statement, apply to the personal information of customers and their workforce members.

Our Workforce and Job Applicants

We collect and retain the types of **professional or employment related personal information** you would expect an employer to have about its existing and former workforce and new job applicants. We provide legally required notices of collection, and describe our use and sharing of the personal information of our workforce and applicants in greater detail in confidential internal human resource manuals and documents accessible to members of our workforce, or by publication on the proprietary workforce/applicant portals and apps we operate. In some cases, such portals and apps may be operated by third parties who transfer the personal information to us. In those situations, the legal responsibility to provide notice usually rests with the third party, not us.

Vendors and Business Partners and Affiliates

Like all large corporate enterprises, we buy goods and services, lease equipment and office space and attend industry events. In doing so, we interact with many existing and potential vendors and business partners from whom we necessarily collect certain personal information in connection with our contractual and business relationships. This information is typically limited to minimum business contact information. We use and share personal information collected from our vendors and business partners to manage, administer and perform under our contracts with them, or share information about our products. We describe our use of vendor and business partner and affiliate personal information in greater detail in our confidential contracts with those parties or on the internal vendor management portals we operate.

Visitors and Users of our Online and Mobile Resources

If you visit and/or use our online and mobile resources, we collect, retain and share certain personal information about you. The remainder of this privacy statement applies entirely to such visitors and users of our online and mobile resources. Thus, the words “**you**” and “**your**” mean only that category of data subjects.

WHAT PERSONAL INFORMATION DO WE COLLECT?

Generally, we collect personal information through automated/technical means and when you voluntarily provide it to us. We describe that automatic collection [here](#). We describe that type of voluntary submission immediately below. ***By using our online and mobile resources, you are signifying to us that you agree with this section of our privacy statement and that we may use and disclose your information as described.***

Voluntarily Submitted Information.

If you choose to participate in, or make use of certain activities and features available via our online and mobile resources, you will need to provide us with information about yourself. The types of personal information you will be submitting to us in those situations is almost always limited to basic **identifiers** such as your name, email address, mailing address and phone number. Here are some of the ways you voluntarily give us your personal information:

- **Emails and Texts** – If you choose to send us an email from our “contact us” link or a similar link, you will be giving us your email address and any other personal information that may be in your message or attached to it. The same is true if you send us a text message.
- **Creating Accounts; Signing up for Newsletters** – If we make an account creation feature available to the general public (that is, to visitors/users who are not our customers or workforce members) you will be giving us at least your email address and potentially other identifiers. The same is true if you sign up to receive a newsletter or other informational or marketing material we publish.

- **Registering for Events** – When you register for events, conferences or programs we ourselves may host (rather than outsource to a third party event manager with its own privacy policies), you will be submitting the types of identifiers described above. If the event requires a fee, we may also ask you to submit **credit card or other financial information**.
- **Social Media and Community Features** – Some of our online and mobile resources may offer social media-like community features letting users post messages and comments, and/or upload image or other files and materials. If you choose to make use of these features, the information you post, including your screen name and any other personal information, will be in the public domain and **not covered/protected by this statement**.
- **Customer Portals and Job Applicants** – Some of our online and mobile resources are used to help us serve our customers and allow candidates to apply for available jobs. We discuss personal information submitted in those situations elsewhere in this statement such as [here](#).

If you prefer we not receive the above-described personal information, please don't submit it. This means you shouldn't participate in the applicable activities on, or use the applicable features available from our online and mobile resources. Such participation and use is strictly your choice. By not participating, you may limit your ability to take full advantage of the online and mobile resources, but most of the content in our online and mobile resources will still be available to you.

Automatically Collected Information.

When you visit or use our online and mobile resources, **basic information about your internet/electronic activity** is automatically collected through your browser via tracking technologies, such as “cookies.” As just about everyone knows by now, cookies are small text files downloaded onto your computer or mobile device. Cookies allow us to collect your **IP address** and recognize your computer or mobile device and store some information about your preferences for using our online and mobile resources or past actions, such as:

- the type of browser and operating system you use
- the date and time and length of your visit
- the pages visited, graphics viewed and any documents downloaded
- links to other sites you accessed from our online and mobile resources or used to navigate to our online and mobile resources

Additional information about cookies and tracking technologies is available [here](#).

If you access our online and mobile resources from a phone or other mobile device, the mobile services provider may transmit to us certain information such as uniquely identifiable mobile device information. That, in turn, allows us to collect **mobile phone numbers and associate them with the mobile device identification information**. Some mobile phone service providers also operate systems that pinpoint the physical location of devices and we may receive this **geolocation data** as well.

Finally, when you use our online and mobile resources, we may allow third party service providers to place their own cookies or similar technologies in order to engage in the same types of collection we describe above. For example, we use third party “web analytics” services such as those offered by Google Analytics. For more information on how Google specifically uses this data, go to www.google.com/policies/privacy/partners/. You can learn more about how to opt out of Google Analytics by going to <https://tools.google.com/dlpage/gaoptout>.

User Beware: External Sites, Apps, Links and Social Media.

We maintain a presence on one or more external social media platforms such as Twitter, Facebook, YouTube and LinkedIn. We may further allow [the community features](#) of our online and mobile resources

to connect with, or be viewable from, that external social media presence. Similarly, our online and mobile resources may contain links to other websites or apps controlled by third parties.

We are not responsible for either the content on, or the privacy practices of, social media platforms, or any third party sites or apps to which we link. Those apps, sites and platforms are not controlled by us and therefore have their own privacy policies and terms of use. **To be clear: neither this statement nor the terms of use appearing on or in any of our online and mobile resources apply to our social media presence or any third party sites or apps to which we may link.** That means even if you take an [affinity action](#) on our specific social media presence, and identifiers about you are automatically collected and given to us as a result, that collection and transfer is governed by the privacy policies and other terms of the applicable social media platform and are not our responsibility. If you have questions about how those apps, sites and platforms collect and use personal information, you should carefully read their privacy policies and contact them using the information they provide.

HOW DO WE USE THE PERSONAL INFORMATION WE COLLECT?

We use the personal information we collect only in the manner and through the means allowed by applicable law. That means we determine whether we have a lawful basis/legitimate business purpose to use your personal information before doing so. As stated in applicable law, such lawful bases/legitimate business purposes include receiving express consent, operating our business, performing a contract, and complying with a legal obligation. More specifically, we use the personal information of [each group of data subjects](#) as follows:

We use the automatically collected personal information described [here](#) to compile generic reports about popular pages/features of our online and mobile resources, and to see how users are accessing our online and mobile resources and in some cases (such as affinity actions) send materials to you. We use the personal information you voluntarily submitted, as described [here](#), to respond back directly to you and/or send you the information you requested or about which you inquired. We also may use any such personal information you provide to customize our programs and newsletters to make them more relevant to you. We do not sell or rent personal information automatically collected by, or which you voluntarily provide when using our online and mobile resources.

We use and retain your personal information in accordance with applicable law and as long as necessary to carry out the purposes described above in accordance with our internal data retention procedures.

WHEN/WITH WHOM DO WE SHARE PERSONAL INFORMATION?

We may share your personal information as described below. This sharing applies to the personal information of all four groups of data subjects.

Affiliates

We may share personal information with other corporate affiliates who will use such information in the same way as we can under this statement.

Legal Requirements

We may disclose personal information to government authorities, and to other third parties when compelled to do so by such government authorities, or at our discretion or otherwise as required or permitted by law, including responding to court orders and subpoenas.

To Prevent Harm

We also may disclose such information when we have reason to believe that someone is causing injury to or interference with our rights or property, or harming or potentially harming other persons or property.

Business Sale/Purchase

If we, or any of our affiliates, sell or transfer all or substantially all of our assets, equity interests or securities, or are acquired by one or more third parties as a result of an acquisition, merger, sale, reorganization, divestiture, consolidation, or liquidation, personal information may be one of the transferred assets.

Vendors and Business Partners

We also share personal information with those of our vendors and business partners who need it to perform under the contracts we have with them. As part of our [Security Program](#), we have adopted standards for those vendors and business partners who receive personal information from us. We attempt to bind such vendors and business partners to those standards via written contracts. Such standards include expectations that when we share personal information with our vendors and business partners, they will comply with all applicable privacy and data security laws and regulations and our Security Program, and will contractually require and cause their subcontractors and agents to do the same.

For any personal information our vendors and business partners process or store at their own locations, we further expect them to use technology infrastructure meeting, at least at the facilities level, minimum recognized standards for security controls. Such recognized standards include those published by the International Standards Organization, the National Institute of Standards and Technology or any reasonably equivalent standards.

Please note, however, that we cannot guarantee that all of our vendors and business partners will agree to the above-described contractual requirements; nor can we ensure that, even when they do agree, they will always fully comply.

HOW DO WE PROTECT COLLECTED PERSONAL INFORMATION?

Our Data Security Program

We have adopted, implemented and maintain an enterprise-wide corporate information security and privacy program that includes technical, organizational, administrative, and other security measures designed to protect, as required by applicable law, against reasonably anticipated or actual threats to the security of your personal information (the “**Security Program**”). Our Security Program was created by reference to widely recognized industry standards such as those published by the International Standards Organization and the National Institute of Standards and Technology. It includes, among many other things, procedures for assessing the need for, and as appropriate, either employing encryption and multi-factor authentication or using equivalent compensating controls. We therefore have every reason to believe our Security Program is reasonable and appropriate for our business and the nature of foreseeable risks to the personal information we collect. We further periodically review and update our Security Program, including as required by applicable law.

Our Incident Response and Management Plan

Despite the significant investment we’ve made in, and our commitment to, the Security Program including enforcement of our third party [oversight procedures](#), we cannot guarantee that your personal information, whether during transmission or while stored on our systems, otherwise in our care, or the care of our vendors and business partners, will be free from either failed or successful attempts at unauthorized access or that loss or accidental destruction will never occur. Except for our duty under applicable law to maintain the Security Program, we necessarily disclaim, to the maximum extent the law allows, any other liability for any such theft or loss of, unauthorized access or damage to, or interception of any data or communications including personal information.

All that said, as part of our Security Program, we have specific incident response and management procedures that are activated whenever we become aware that your personal information was likely to have been compromised. Those procedures include mechanisms to provide, when circumstances and/or our legal obligations warrant, notice to all affected data subjects within the timeframes required by law, as well as to give them such other mitigation and protection services (such as the credit monitoring and ID theft insurance) as may be required by applicable law. We further require, as part of our vendor and business partner oversight procedures, that such parties notify us immediately if they have any reason to believe that an incident adversely affecting personal information we provided to them has occurred.

YOUR RIGHTS AND OPTIONS

If we are using your personal information to send you marketing materials, such as newsletters or product alerts via text or email, you may opt out by following the opt-out instructions in the email or other communication (e.g., by responding to the text with “STOP”). In addition, certain of our online and mobile

resources will provide a centralized opt-out link allowing you to opt out of any programs in which you may have enrolled using that particular online and mobile resource. When we receive your request, we will take reasonable steps to remove your name from our distribution lists, but it may take time to do so. You may still receive materials for a period of time after you opt out. In addition to opting out, you have the ability to access, amend and delete your personal information by contacting us using the contact information below. Opting out of or changing affinity actions or other submissions or requests made on our external social media presence, will likely require that you do so directly on that applicable platform as we do not control their procedures.

Some browsers have a “do not track” feature that lets you tell websites that you do not want to have your online activities tracked. At this time, we do not specifically respond to browser “do not track” signals.

CHILDREN’S PRIVACY

Federal law imposes special restrictions and obligations on commercial website operators who direct their operations toward, and collect and use information from children under the age of 13. We take those age-related requirements very seriously, and, consistent with them, do not intend for our online and mobile resources to be used by children under the age of 18, and certainly not by anyone under the age of 13. Moreover, we do not knowingly collect personal information from minors under the age of 18. If we become aware that anyone under the age of 18 has submitted personal information to us via our online and mobile resources, we will delete that information and not use it for any purpose whatsoever. We encourage parents and legal guardians to talk with their children about the potential risks of providing personal information over the Internet.

THE LAW VARIES FROM PLACE-TO-PLACE: CCPA AND THE GDPR

Privacy and data protection laws vary around the world and among the several United States. Most prominently, residents of California and data subjects whose personal information was obtained from them while they were in the European Economic Area, the United Kingdom and Switzerland, have certain additional rights in cases where the party collecting that information is governed by the applicable law. We have reviewed our business operations and data-related business practices with legal counsel in the context of the General Data Protection Regulation under European law (the “**GDPR**”) and the California Consumer Privacy Act (the “**CCPA**”). As a result of that review, as of the effective date of this Privacy Policy, we do not believe we are governed by either the GDPR or CCPA.

We control and operate the online and mobile resources from within the United States of America (the “**U.S.**”). Information collected through the online and mobile resources is stored and processed in the United States. Although we do not actively block or monitor visitors from other countries, the online and mobile resources are directed only at visitors from the U.S. At the same time, however, we do not specifically operate in, or target consumers in California, nor do we meet the statutory definition of a “business” for CCPA purposes. As such, while this privacy statement is consistent with U.S. law and practice it is not adapted to the laws of other countries (including European data security and privacy laws) or tailored to the CCPA.

We have, as explained elsewhere in this privacy statement, nonetheless adopted and implemented data security and privacy practices and procedures, that include technical, organizational, and administrative measures reasonably designed to protect, in a manner broadly consistent with GDPR and CCPA (as well as industry standards), the personal information of those with whom we do business.

CHANGES TO THIS PRIVACY STATEMENT

We reserve the right to change or update this statement from time to time. Please check our online and mobile resources periodically for such changes since all information collected is subject to the statement in place at the time of collection. Typically, we will indicate the effective/amendment date at the beginning of this statement. If we feel it is appropriate, or if the law requires, we’ll also provide a summary of changes we’ve made near the end of the new statement.

CONTACTING US

If you have questions about our privacy statement or privacy practices, please contact our Privacy Office:

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