

# Privacy Policy

## **Express Employment Professionals Specialized Recruiting Group Express Healthcare Staffing**

Effective Date \_\_\_\_\_

### **Applicability**

This Privacy Policy describes how Express Employment Professionals, Specialized Recruiting Group, and Express Healthcare Staffing (collectively, the “Express Brands,” “our,” “we,” or “us”) collect and process personal information from current and former franchisees and applicants for a franchise. This Privacy Policy applies to our collection of data through our websites and mobile apps and our interactions with you offline or via phone.

You can print a copy of this policy by clicking [here](#).

## **NOTICE AT COLLECTION**

### **Categories of Information We Collect.**

The type of personal information we collect about you depends on our relationship with you and the information that you share with us. When you apply for a franchise, we collect certain financial information about you and your spouse. Below, we describe the categories of personal information we have collected in the last 12 months and how we use and disclose such personal information to third parties.

- (a) Identifiers, such as name, postal address, date of birth, email address, social security number, driver’s license number, online identifier, IP address or other similar identifiers.
- (b) Personal information described in subdivision (e) of Section 1798.80 (California customer records statute), such as name, address, telephone number, signature, insurance policy number, education, employment history, bank account number and other financial information, medical information, and health insurance information.
- (c) Demographic and other information considered to be protected classifications under federal or California law, such as age, race, veteran status, disability, criminal history, marital status, and medical conditions.
- (d) Commercial information about you and your spouse, including your assets, liabilities and sources of income.
- (e) Internet or other similar network activity, including, but not limited to, browsing history, search history, browser settings like language preference, and information regarding your interaction with a website, application, or advertisement.
- (f) Geolocation data.
- (g) Audio information such as a voice recording.
- (h) Professional or employment-related information, such as past and present work history, affiliations, education, and employment.
- (i) Inferences relating to your preferences, attitudes, characteristics, or behaviors drawn from information we collect and insights we receive from third parties such as our marketing and advertising partners and data analytics providers.
- (j) Sensitive personal information, such as social security, driver’s license, state identification card, racial or ethnic origin, citizenship or immigration status (as noted above). We do not use or disclose sensitive personal information for inferring characteristics or for purposes other than those permitted by law.

Personal information does not include information excluded from the scope of personal information under applicable law, including: (a) personal information that is deidentified or aggregated information; (b) publicly available information or (c) truthful information that is a matter of public concern.

**Sources of Information.** We collect information that you provide to us (1) when you use our websites and mobile apps (collectively, “Online Services”), or contact us by phone, mail or in person; (2) when you apply for a franchise with us; and (3) in the course of our franchisor/franchisee relationship.

For example, you may provide information to us when you:

- apply for a franchise;
- use our Online Services to create and manage your account with us;
- access and use Online Services;
- provide feedback, request information, or otherwise contact us through the Online Services;
- subscribe to newsletters or other communications from us;
- participate in social media platforms where Express Brands maintains a presence, such as Facebook and LinkedIn, or when you make information available to us and others via social media or via forums, blogs, email lists, chat rooms, or other similar technologies;
- participate in surveys, sweepstakes, or other promotions;
- conduct searches through the Online Services; and/or
- otherwise share information about yourself through the Online Services.

We may also obtain information about you from others. For example:

- *References you provide.* We may contact references that you provide us in your franchise application.
- *Other third-party sources.* We may obtain information about you from credit reporting agencies, public databases, social media platforms, or third parties such as analytics or advertising and marketing providers, where permitted under applicable law.

Examples of information we receive from third-party sources include: (1) information provided from sources you have authorized to share information with us, either on our Online Services or via third-party applications, devices, websites, or other digital interfaces; (2) results of background and criminal checks; and (3) credit history information from credit bureaus.

**Automated data.** We collect information using automated technologies such as cookies, web beacons, pixel tags or other similar technologies when you use our Online Services, download our mobile apps, or use social media platforms or other third-party platforms.

Information collected using automated technologies may include your IP address and associated activity tracking (such as when and how frequently you access the Online Services, the pages viewed and features you access during your visit to our Online Services and websites you visit prior to or after visiting our Online Services); the type of browser and operating system you use; responses to advertisements and promotions on the Online Services, other websites, and mobile apps; emails from us that you open and/or forward; the mobile device you use and its temporary or persistent unique device identifiers; data regarding your internet service provider or mobile carrier geolocation data (to the extent provided by you or your device); and inferences which we may gather relating to your preferences, attitudes, characteristics, or behaviors.

**Monitoring.** We and our third-party vendors and partners may monitor visits to our websites and mobile apps, including sessions of users. This monitoring may log the details of your visits to our websites and mobile apps, such as clicks, page visits, text entered, how long you spent on a page, what you viewed on a page, information you submit, communications and other details of your visits. Automated technologies may be used to collect and retain usage data for the purposes described in this Privacy Policy, including for marketing, analytics, and security purposes and to improve your experience using our Online Services. Additionally, if you engage with chat functionalities that may be offered on our websites or mobile apps, your conversations via these functionalities may be retained by us and our vendors for our business purposes. This can include any interaction between you and our chat technologies, information you input into chats, and the conversations you have through our chat functionalities.

### **How we use your information**

We use all categories of information we collect, on their own and combined with other information we collect about you, for our business purposes, including:

- to process franchise applications;
- for our everyday business purposes in the management of our relationship with you, including:
  - providing training and other resources
  - collection of franchise fees
- to respond to your requests and communicate with you including via telephone, text, or chat;
- to communicate with you regarding staffing needs and opportunities and potential candidates;
- to deliver content and marketing communications that we think may interest you, including ads or offers tailored to you based upon your browsing and usage history, both within these Online Services and on other websites and mobile apps;
- for programs, surveys and other offers or promotions;
- to analyze our franchisee relationships, Online Services and marketing trends;
- to conduct internal research;

- to comply with the law, regulations, and other legal obligations;
- to properly verify your identity, prevent fraud and enhance security;
- for short-term, transient use including contextual customization of ads;
- to protect our rights and the rights of others; and/or
- for other purposes, as permitted by law or to which you consent.

## **When We Disclose Information To Others**

Within the last 12 months, we have disclosed all categories of your information within Express Brands and to third parties to support our business, for the purposes described above, or with your consent. We disclose your information to the following types of third parties:

- *Other Franchisees.* We may share your contact information with other franchisees in support of our business.
- *Employees and Associates.* We may share your contact information with our employees and associates in furtherance of our staffing services.
- *Service Providers and other Partners.* We share information with service providers who provide services on our behalf or at your direction for the purposes described in this Privacy Policy, including IT support, administration of our staffing services, fraud detection, advertising services, and marketing research and analysis. We may also disclose the personal information we collect to our analytics vendors to develop aggregate analytics and business intelligence for our advertising and marketing purposes, and to other parties providing services to you.
- *Clients.* We may share contact and demographic information with clients using our staffing services.
- *Other Entities.* When you apply for a franchise, we may share your information with all the entities you have authorized us to share information with or request information from in the application (e.g., your references, credit agencies, etc.).
- *Corporate Activities.* We may share your information as part of a merger, acquisition or other sale or transfer of all or part of our assets or business. We may also share your information in the event of a financing or bankruptcy.
- *Government Entities, Regulators, and Law Enforcement.* We may disclose information about you to third parties under certain circumstances, such as in connection with illegal activity performed by a user on the Online Services, or to respond to a subpoena, court order or other legal process. We may release information that we collect to law enforcement, government officials, professional advisors, or third parties as required or permitted by law, to protect our rights and the rights of others, or in our discretion to prevent fraud, harm, or loss to you, ourselves, or others.
- *Social Media.* We may include widgets, tool bars, or icons from social media providers on our Online Services that allow you to interact or share information with them, and these social media networks may collect information about your browsing on the pages of our Online Services. Such collection may occur where the widgets, tool bars, or icons are visible, even when you do not click on or otherwise activate the widgets, tool bars, or icons. The privacy policy of the relevant social media network controls the collection, use and disclosure of all information collected by that social media network.

## **You Have Certain Choices**

We provide you with options on how we use your information, as described here:

**You can opt out of receiving our marketing emails.** To stop receiving our promotional emails, follow the “unsubscribe” instructions in any promotional message you get from us. If you opt out of getting marketing messages, you may still receive certain communications from us relating to your franchise, use of the Online Services, notices of changes to this Privacy Policy (or other terms or policies), or similar administrative, transactional, or educational messages. These include responses to your questions or other necessary information about your franchise

**You may make other choices about how we communicate with you.** For example, you may adjust your device or browsing settings to disable, prohibit or turn off automated technologies or geolocation or location services features. You may also adjust your device’s settings regarding the use of advertising identifiers. Adjusting settings or deleting cookies or other automated technologies in one device or browser will only apply to that device or browser. If you choose to limit collection of your information in these ways, certain Online Service features may not function properly, or at all. The Self-Regulatory Program for Online Behavioral Advertising provides consumers with the ability to manage certain choices online here and provides a tool for managing mobile choices here: <https://optout.aboutads.info/?c=2&lang=EN>. As of the Effective Date listed above, we participate in a service called Global Privacy Control (GPC) that lets you set a “Do Not Sell or Share” preference at the browser level using a GPC-enabled browser or browser extension. If you use GPC, our Sites will treat the browser and device you use to access our website as opted-out from sales or sharing in a frictionless manner to the extent we engage in such processing. You may learn how to set up GPC by visiting <https://globalprivacycontrol.org/>.

**Residents of California** have the following rights to make requests regarding your personal information:

1. *Right to Know:* You have the right to request that we disclose what personal information we collect, use, disclose, and sell, including: i) specific pieces of information that we have collected about you; ii) categories of personal information we have collected about you; iii) categories of sources from which the personal information is collected; iv) categories of personal information about you that we sold or disclosed for a business purpose; v) categories of third parties to whom the personal information was sold or disclosed for a business purpose; and vi) the business or commercial purpose for collecting, selling or sharing personal information.
2. *Right to Correct:* You have the right to request that we correct inaccurate personal information that we maintain about you.
3. *Right to Delete:* You have the right to request that we delete personal information we have collected about you, subject to our legal rights or obligations to retain such personal information. Please note that once we delete your information, we may not be able to restore it.
4. *Right to Opt-Out of Sales or Sharing:* Under the California Consumer Privacy Act (the “CCPA”), you have the right to opt out of the disclosure of personal information about you for monetary or other valuable consideration (a “sale”) and/or the disclosure of personal information for purposes of behavioral advertising (“sharing”). Our use of tracking technologies may be considered a “sale” or “sharing” under the CCPA. To opt-out, go to the Privacy Data Request Form, then complete the form by selecting the option Do Not Sell or Share My Personal Information, or by using the GPC browser based opt out signal (discussed in the [You May Make Other Choices About How We Communicate With You](#) section above. We do not sell or share personal information of individuals we know to be under the age of 16.

*Exercise your rights.* To exercise your rights please fill out the Privacy Data Request Form. You can also contact us at [privacyrequest@expresspros.com](mailto:privacyrequest@expresspros.com) or 1-888-635-1662.

*Request Verification.* We will verify your request by matching information you provide to us with information we already have about you. We will not discriminate against you because you have exercised any of your rights under the CCPA. You can designate someone else to make a request by having them execute a signed letter verifying their right to act on your behalf. In some situations, we may not be able or required to process your request. This may include if a legal exception applies. If you disagree with our decision, you can contact us as indicated in the [Contact Us](#) section of this Privacy Policy.

### **Our Do Not Track Policy**

We do not currently take actions to respond to “Do Not Track” signals from browsers because a uniform technological standard has not yet been developed. However, we respond to browser-based GPC signals as the opt out preference signal as described in the [You Have Certain Choices](#) section above.

### **We Use Reasonable Security Measures**

We use reasonable organizational, technical, and administrative measures designed to safeguard your information against loss, theft, unauthorized use, disclosure, or modification. Of course, despite these measures, no network or system is entirely secure, and we cannot guarantee the security of networks and systems we operate or that are operated on our behalf.

### **Third-Party Sites And Links**

If you click on a link to a third-party site from our Online Services, you will be taken to websites we do not control. This includes our pages on social media sites. This policy does not apply to the privacy practices of these third-party websites or platforms. Read the privacy policy of other websites carefully. We are not responsible for these third-party practices, or for the practices of our clients.

### **Data Retention**

We retain personal information as long as necessary or relevant for the purposes for which they were collected. We also keep information for the period of time required by law.

### **Information Collection From Children**

Our Online Services are meant for adults. We do not knowingly collect personal information from children under 13 without permission from a parent or guardian. If you are a parent or legal guardian and think your child under 13 has given us information, you can email us or write to us as indicated in the [Contact Us](#) section of this Privacy Policy and we will work to delete the information. Please mark your inquiries “COPPA Information Request.”

## **Contact Us**

If you have questions about this Policy, you can write or call us at:

Express Employment International  
Legal and Compliance Department  
9701 Boardwalk Blvd.  
Oklahoma City, OK 73162  
(405) 840-5000  
Fax: (405) 717-5516

You can email us at [privacyrequest@expresspros.com](mailto:privacyrequest@expresspros.com).

## **Policy Updates**

This Privacy Policy may be updated from time to time to reflect changes in our personal information practices, and we will notify you of any such changes pursuant to applicable law.