



# Code of Conduct: Privacy Policy – Candidates

Design Group Staffing Inc. hereafter referred to as Agilus, respects the privacy of individuals in all aspects of our business operations. We have a firm, longstanding commitment to protecting all personal information within our knowledge and under our control, and we have created this Privacy Policy to demonstrate that commitment.

Your personal information is only collected, used and disclosed by Agilus in accordance with this Privacy Policy or otherwise as permitted by law. Whenever and insofar as possible, we have also attempted to ensure that our clients and other organizations with which we deal respect privacy rights and protect personal privacy. However, you need to be aware that this Privacy Policy does not apply to any organizations other than Agilus, and that we do not review or control the privacy policies and practices of any outside organizations.

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## What are our overall, general purposes for collecting, using and disclosing your personal information?

In very general terms, we will collect, use and disclose your personal information in order to attempt to place you on a temporary or contract assignment or in the employment of one of Agilus' clients.

For this purpose and as part of this process, we will take a number of steps, typically including but not necessarily limited to:

- Obtaining your résumé and references (and any updates thereof);
- Interviewing you;
- Interviewing your references;
- Verifying information and performing other searches and checks, done either by Agilus or by an independent agency on behalf of Agilus;
- Evaluating all information about you to analyse your suitability to potential positions and placements and to analyse the suitability of potential positions and placements to you; and

- Disclosing any information about you as provided by you, by your references and by other sources to any present or future client of Agilus who, based on your qualifications, work requirements, desires and other factors and determined solely in the discretion of Agilus, has or may have a position to which you are or may be suited.

We may also use your personal information to assist us in improving our overall service to our candidates like yourself and to our clients. In this respect, we may use your personal information for internal training purposes or to compile statistical and other results related to Agilus's business, and if so we may circulate those results both internally and externally to our clients.

Agilus may also use your personal information for other uses and purposes from time to time, always acting reasonably.

## What personal information do we collect?

In order for us to assist you and our clients in the most effective way and to effectively attempt to secure the best, most suitable position for you, we require certain information about you. We will obtain some of this information from you, and will obtain other information from external sources.

In order to serve you, we require the following information from you:

- Your contact information [full name including all past and present aliases, address(es), phone number(s), fax number(s), email address(es);
- Your résumé (and any updates thereof);
- Reference contact details [name, business name, business address, business telephone number and position with the business]; and
- A description of the types of positions that interest you.

We assume that, before providing us with any contact details for your references, you have obtained their permission to do so. To ensure that we do not offend your references' privacy rights, we ask that you only provide the information about them that we list above as "Reference contact details" and we understand that you have secured their consent before providing their information to us. Should your reference require your written consent before disclosing your personal information to us, we will contact you and ask you to sign an Authorization form.

In the event you are placed on a temporary or contract assignment through us, we also need specific information for payroll and benefits administration purposes:

- Your banking information;
- Your Social Insurance Number;
- Your date of birth;

- Tax deduction information;
- Emergency contact information; and
- Information about your beneficiaries, if you are enrolled in our benefit packages.

In using our services, we may also ask you to provide us with the following additional information:

- Educational records;
- Reference letters; and
- Results of specialized testing or professional designation testing.

Notes we take when we interview you will also form part of the information we have on our file about you.

We, either directly or using external service-providers, may collect, use and disclose some or all of the following information for our file about you from sources other than yourself:

- Verification of education and professional qualification;
- Verification of employment history;
- Criminal record check, if required by the position;
- Drug and alcohol testing, if required by the position;
- Medical information (as it pertains to the Agilus' injury management program);
- Skills testing;
- Information obtained through reference and background checks; and
- COVID-19 Proof of Vaccination, if required by the position. (We work with employers who have vaccination requirements and we may request voluntary proof of vaccination from our workers in order to offer assignments within those worksites/facilities). Agilus has a stringent procedure in place to collect this information.

In some cases Agilus will initiate the collection of this information; in others, the information will be obtained at the request of our client. Regardless, we will not collect, use or disclose any such information unless we feel that it is reasonable in all the circumstances to do so and that there is some specific reason related to the prospective position or placement or your suitability for it that requires us to collect, use and disclose this information and that we therefore have your reasonable implicit consent, or unless we are required to do so by law, or unless we have your express consent. At your sole discretion, you may withhold your consent; however, doing so might limit the possible positions or placements for which you are considered.

## Why do we collect this personal information, and how do we use it?

We use the information we collect about you for several purposes:

- To understand your qualifications, needs and preferences;
- To find the best, most suitable employment opportunities for you;
- To fulfil our clients' requests for information about candidates;
- To provide you with appropriate training or career transition services;
- To assess and develop our business and operations to better service job seekers and our clients; and
- To provide payroll and other human resources functions to you.

On occasion we forward résumés like yours to our clients in anticipation of a position potentially coming available, even though such a position is prospective only and is not yet advertised or posted. In this way we attempt to promote suitable candidates to our clients before those clients search elsewhere to fill such positions.

We also use your contact information, including your email address, to forward general, unsolicited information from us to you about job opportunities, industry and employment trends and about ourselves. However, we do not sell or otherwise provide your personal information to any other organization for this or any similar purpose.

In order to search for the placement or position best-suited to your skills, wants and needs, we share our complete file about you with all of our branches and affiliates throughout Canada unless you instruct otherwise.

## When and to whom do we disclose personal information?

Your personal information is never traded, sold or leased by us to any external organization. Your information is only disclosed for Agilus's legitimate business purposes or as necessary to meet legal and regulatory requirements, for instance to comply with a court order.

We share all personal information we have about you with all of our Canadian branches and affiliates (currently located in Alberta, Ontario, British Columbia and Manitoba, and Nova Scotia). As well, in the normal course of business, we disclose your personal information to our clients when we feel that there is a potential for a job placement with that client, either when there is a specific job opening to which you are well-suited or when we reasonably believe that such a position may be available or may be coming available. As a job-seeker, you rely on us to share your information in this way so as to provide the best placement services possible both to you and to our clients who may wish to hire you.

We may also share some information we have collected about you with organizations that perform testing or background checks, including criminal, educational and driving records. These organizations may be the agencies themselves that provide the check results or may be intermediary agencies to whom we out-source this work. Some of these checks are expressly required by our clients who are considering you for a placement; others are initiated by Agilus as part of our due diligence prior to recommending you for a placement.

Agilus will also disclose your personal information otherwise as required by law.

## **Have you consented to our collection, use and disclosure of your personal information?**

Having agreed to use our services and providing us with your personal information, your consent to the collection, use and disclosure of your personal information as specified in this Policy is implied.

We also imply your consent to use and disclose your personal information for purposes that are reasonable and are obvious and/or necessary in using our services.

Although we imply your consent in any event, we may seek your express consent to contact your references, to collect, use and disclose information we obtain from your references and for your references to disclose that information to us. In granting your consent for these purposes you also release, remise and forever discharge, to the fullest extent possible at law without limitation, and agree to fully indemnify your references and Agilus from and for any and all legal, financial and other liability, loss or damage whatsoever flowing from that information or its collection, use or disclosure.

## **What can you do if you wish to withdraw your consent?**

A revocation of consent must always be in writing.

You may withdraw any express consent you previously gave as indicated on your executed Candidate Consent Form at any time upon giving proper written notice to Agilus as indicated below. We may then require you to complete and execute a new Candidate Consent Form.

If you wish to withhold or subsequently withdraw your consent in regards to any of the matters to which we imply your consent under the terms of this Privacy Policy, it is incumbent upon you to inform us of that in writing in sufficient detail and with sufficient clarity for us to identify precisely the point to which you do not consent. We will then evaluate and advise you whether we are able to provide or to continue to provide our services to you as a candidate.

You need to be aware that withholding or withdrawing your consent might impact negatively on Agilus' ability to serve you and to secure employment or a placement for you.

## **What about personal information we collected prior to the coming into force of applicable privacy legislation?**

If we collected your personal information and inputted it into our internal candidate database before applicable legislation protecting your privacy and personal information came into force, that information will remain there in its most recent form until it is purged or destroyed in accordance with this Privacy Policy. If, in the interim, we feel that you are a potential match for a placement or prospective placement with an Agilus client or clients, we will use your information only to identify such a possible match and to contact you to determine whether or not you are interested in having us pursue your possible placement. At that time, we will seek your consent to collect new and updated personal information and to use and disclose all of your personal information we have, in accordance with this Privacy Policy.

## **How long do we retain your information, and then what do we do with it?**

Unless you direct otherwise, we retain your personal information, including but not limited to your personal employee information, in our records notwithstanding that you may be considered for, but not placed in a particular position. Unless you indicate otherwise when executing your Candidate Consent Form, we imply your consent for Agilus to collect, use and disclose your personal information, including but not limited to your personal employee information, on an on-going basis in order for you to be considered for numerous potential placements both with Agilus and with our clients.

We retain your personal information for 10 years from the date that you submit to us your information including your résumé in the course of using our placement services, or for 10 years from the last date that you consent to the collection, use or disclosure of your information by us, or for 10 years from the date that we place you with one of our clients on a permanent basis, or 10 years from the date you were last employed by us on assignment, whichever is latest. Upon the expiry of this 10-year period, all of your personal information is fully purged from our systems electronically and any hard-copies are shredded and safely discarded. If you wish for us to cease to collect, use and disclose your information and to purge and discard all of it in less than 10 years, it is incumbent upon you to instruct us in writing to do so, in which case we will be pleased to comply with your request as soon as is practicable, subject to any legal and tax requirements.

## What are our practices related to privacy and security on our web sites?

Agilus hosts a number of sites on the World Wide Web ("our Sites").

We collect user-specific information regarding what web pages visitors' access or visit as well as information volunteered by the visitor (such as survey information or site registrations). The information we collect on our Sites is used to improve the content of our Sites or used for internal review and is then discarded. We do not share information collected on our Sites with any other organizations for commercial purposes.

Our Sites may use cookies to keep track of activity on them as well as to deliver content specific to your file or interests, to save your password and to save other personal information so that you do not have to re-enter it each time you visit our Sites. You may disable these cookies, but doing so may limit your ability to access or use our Sites. By accessing and using our Sites without disabling the cookies you are consenting to our collection and use of your information in this way.

Our Sites may contain hyperlinks to outside web sites controlled by other parties. We are not responsible for and do not endorse the contents or use of those other sites. Specifically, you need to be aware that we do not review or control the privacy policies relating to those other sites and that we are not responsible for the protection of information or the privacy of any individual accessing those other sites.

We always use industry-standard encryption technologies when receiving and transferring consumer data exchanged with our Sites.

## How do we keep your personal information secure?

We have staff policies and operation procedures in place to ensure that your personal information, in both paper and electronic format, is kept safe and secure. We always use industry-standard encryption technologies when receiving and transferring electronic information. Also, staff training on the importance of privacy and security is undertaken regularly, which enhances the protection of all personal information held by Agilus.

As well, we require that each external organization with which we deal has in place policies and procedures to protect and safeguard any personal information that it may obtain from us in accordance with this Privacy Policy. You need to be aware that Agilus does not conduct a thorough, comprehensive or exhaustive review of the privacy policies of outside organizations and does not oversee their implementation or ensure that they are followed in every case. Agilus does, however, make every effort reasonable in the circumstances to ensure that acceptable standards are maintained by these other organizations, and we are pleased to make best efforts to address any questions or concerns that you might have in this regard.

## What if you respond to any Agilus surveys?

Periodically, Agilus may approach you to voluntarily complete a survey. You will not be required to do so, and if you choose to respond you may do so unanimously if you wish. Responses to the survey may take the form of multiple choice or written responses or a combination of the two, and the results will be used internally for us to monitor our operations, assess our successes and failures, revise our procedures to make them more effective, or provide confidential demographic information to our client(s).

By responding to one of our voluntary surveys, you are consenting to the collection, use and disclosure of the information included in or forming your answers, including any of your personal information divulged there for the purposes of the survey.

## How can you access your personal information and verify its accuracy?

Agilus relies on information provided by you and by third parties such as anyone providing references, confirming educational background or conducting checks. You may at any time submit a written request for access to your personal information in our possession and under our control. Upon payment of an administration fee, we will provide you with a copy of the personal information we have about you on our file to the extent provided by law.

Agilus strives to maintain accurate records of your personal information, but cannot do so without your help. As part of this on-going effort, we ask that you provide us with your most current information and update us as that information changes. Write to the address below and advise us if any personal information you have provided to us in the past is incomplete, inaccurate, or no longer relevant, and we will be pleased to make the appropriate modifications.

## Where can you get more information?

Agilus takes full responsibility for the management and confidentiality of the personal information it collects. If you have any questions, comments or concerns about this Privacy Policy or anything related to it, or if you feel that Agilus is not abiding by this Privacy Policy, or to give any notices pursuant to this Privacy Policy, please contact:

### Privacy Officer

Agilus  
10012 Jasper Avenue  
Edmonton, AB T5J 1R2  
Phone: 780.428.1505  
Fax: 780.428.7095