



**Your privacy is important to Provade. This privacy statement applies to all of the services offered by Provade. It provides information about the personal information that Provade collects, and the ways in which Provade uses that personal information. Our basic principles are:**

- We will protect your privacy and will keep your personal information safe
- We will not sell your personal information to anyone
- We will fully disclose our privacy policies in plain language and make them accessible
- We will notify you of any revisions to our policies
- We will provide a method for you to review and correct your information

**Provade may collect and use the following types of personal information:**

- Information about your use of this website
  - Logs of access to the system
  - Logs of performance you experienced using the application
- Basic information you provide to register with the application including:
  - Name
  - Email
- Information about transactions carried out over this website, including:
  - Timesheet information
  - Pay Rates
  - Payroll Amounts
  - Progress reports
- Information that you provide for the purpose of subscribing to the website services including:
  - Resumes
- Information you provide in communicating with us may be retained to process your inquiries and respond to your requests.

**Provade May Use your Personal Information to:**

- Administer the VMS Website
- Personalize the website for you
- Enable your access to the website
- Enable the use of the website service
- Make information about you available on the website to facilitate obtaining and using services from the website.
- Supply services to you
- Auditing and research to maintain and protect our services

**Third Party Access:**

- Access to your information is limited to third parties with contractual obligations to maintain the privacy of your information and the only purpose for which it is used is for participation in or management of a client's contingent work program.
- Third parties are limited to:
  - Provade's subcontractors who help develop and maintain the Provade VMS tool;
  - Provade's clients/subscribers who use the Provade VMS tool to manage their contingent work programs,
  - Provade's managed services provider partners, who are engaged by clients/subscribers to run their contingent work programs, and
  - Your employer who oversees your assignment with Provade's client.

*Where Provade discloses your personal information to its service providers and service coordinators for these purposes, the service coordinator and service provider in question will be obligated to use that personal information in accordance with the terms of this privacy statement. Any third parties that are presented with your personal information will be obligated to use that personal information in accordance with the terms of this Privacy Statement. In addition to the disclosures reasonably necessary for the purposes identified elsewhere above, Provade may disclose your personal information to the extent that it is required to do so by law, in connection with any legal proceedings or prospective legal proceedings, and in order to establish, exercise or defend its legal rights.*

### **Cookies:**

When you use Provade's services, we send cookies to your computer that uniquely identifies your browser.

Cookies are used to improve the quality of the service and are not used to track your access outside of Provade's services. These cookies may also be used to easily bring you back to Provade's services if you have been sent to another web site for specialized processing.

If you opt out (reset your browser to refuse the use of cookies), some services provided by Provade may not work.

### **Securing your Data:**

Provade will take reasonable technical and organizational precautions to prevent the loss, misuse or alteration of your personal information.

Provade will store all the personal information you provide on its secure servers.

Information contained in electronic transmissions between Provade and its clients or third party vendors will be protected by encryption technology.

We restrict access to personal information to Provade employees and contractors who have a need to know that information to operate, develop and improve our services. These individuals sign confidentiality agreements and may be subject to disciplinary actions, including termination and criminal prosecution, if they violate these agreements. All employees sign confidentiality agreements, as well as offer letters, that allude to this. Contractors also sign NDA that also highlight this confidentiality issue.

### **Data Integrity:**

Provade uses the personal information only for the purposes for which it was collected. We review our data collection, storage and processing practices to insure we collect and use this information only for the intended purposes as permitted under this policy. We take reasonable steps to insure the data collected and the processing of that data insures the accuracy, completeness and currency of that information.

### **Cross-border Data Transfers:**

Information that Provade collects may be stored and processed in and transferred between any of the countries in which Provade operates to enable the use of the information in accordance with this Privacy Policy.

Provade complies with the EU – US Privacy Shield as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. Provade has certified that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity, and Purpose Limitation, Access and Recourse, Enforcement and Liability. Provade’s participation in the EU – US Privacy Shield for compliance is under the jurisdiction of the Federal Trade Commission. If there is any conflict between the terms of this Privacy Statement and the Privacy Shield Principles, the Privacy Shield Principles shall govern issues related to data from the European Union or about European Union individuals. For more information about the Privacy Shield program, please visit <https://privacyshield.gov>, and to view our certification page, please visit <https://www.privacyshield.gov/list>.

Provade also complies with the US-Swiss Safe Harbor Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from Switzerland. Provade has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. If there is any conflict between the policies in this Privacy Statement and the Safe Harbor Privacy Principles shall govern issues related to data from Switzerland or about Swiss individuals. To learn more about the US – Swiss Safe Harbor and to view Provade’s certification page, please visit <http://www.export.gov/safeharbor/>.

Provade is committed to protecting your privacy by following these principles:

1. **Notice:** When we collect your personal information, we’ll give you timely and appropriate notice describing what personal information we’re collection, how we’ll use it, and the types of third parties with whom we may share it.
2. **Choice:** We’ll give you choices about the ways we use and share your personal information, and we’ll respect the choices you make. When you provide your information to seek or maintain a contingent work assignment with a Provade client, you are opting in to Provade’s use of your information for that limited purpose. Use or sharing with other clients or for other purposes will always require separate opt-in. You have the right to opt out of sharing your information with clients with whom you do not have a current active work assignment.
3. **Data Integrity and Purpose Limitation:** We’ll collect only as much personal information as we need for specific, identified purposed and we won’t use it for other purposes without obtaining your consent. However, Provade may be required to disclose an individual’s personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.
4. **Retention:** We’ll keep your personal information only as long as we need it for the purpose for which we collected it or as permitted by law.
5. **Accuracy:** We’ll take the appropriate steps to make sure the personal information in our records is accurate and give you the opportunity to correct your information.
6. **Access:** We’ll provide ways for you to access your personal information, as required by law, so you can correct inaccuracies.
7. **Security:** We’ll take appropriate physical, technical and organizational measures to protect your personal information from the loss, misuse, unauthorized access or disclosure, alteration and destruction.
8. **Sharing:** Except as described in this policy, we won’t share your personal information with third parties without your consent.
9. **Accountability for Onward Transfer:** If we share your personal information or transfer it to another country, we’ll take appropriate measures to protect your privacy and the personal information we transfer. Further, Provade acknowledges that it has potential liability in cases of onward transfers to third parties.

10. **Recourse, Enforcement, and Liability:** We'll regularly review how we're meeting these privacy promises, and we'll provide an independent way to resolve complaints about our privacy practices. The Federal Trade Commission is the enforcement authority that has jurisdiction over Provade's compliance with the Privacy Shield.

#### Contact Provade:

To access your information, ask questions about our privacy practices, or file a complaint, please contact us:

Provade Security Office (Security\_Office@provade.com)

Provade, Inc.  
770 N Jefferson, Suite 230  
Milwaukee, WI 53202  
(414) 395-8050

#### Disputes:

##### EU – US Privacy Shield Disputes:

In compliance with the EU – US Privacy Shield Principles, Provade commits to resolve complaints about your privacy and our collection or use of your personal information. European Union individuals with inquiries or complaints regarding this Privacy Statement should first contact Provade's Security Office listed above. If your inquiry or complaint with Provade is not satisfactorily addressed, you may also refer your unresolved privacy complaint under the EU – US Privacy Shield Principles to BBB EU Privacy Shield, a non-profit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus by visiting [www.bbb.org/EU-privacy-shield/for-eu-consumers](http://www.bbb.org/EU-privacy-shield/for-eu-consumers) for more information or to file a complaint.

Provade acknowledges that it may be possible, under certain circumstances, for individuals to invoke last resort binding arbitration before the Privacy Shield Panel to be created by the U.S. Department of Commerce and the European Commission.

##### US – Swiss Safe Harbor Framework Disputes:

In compliance with the US – Swiss Safe Harbor Principles, Provade commits to resolve complaints about your privacy and our collection and use of your personal information. Swiss citizens with inquiries or complaints regarding this Privacy Statement should first contact Provade's Security Office listed above. If you do you receive timely acknowledgement of your complaint or if your complaint is not satisfactorily addressed, you may visit [www.bbb.org/us/safe-harbor-complaints](http://www.bbb.org/us/safe-harbor-complaints) for more information or to file a complaint.

#### Updating this statement:

Provade may update this Privacy Statement at any time in compliance with applicable laws.