

**Advanced Technology Services  
HR and Job Applicant Privacy Notice**

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Advanced Technology Services ("**ATS**") and its affiliates and operating divisions are committed to protecting the privacy and security of your personal information while you are an employee, after you end your employment and while you are a job applicant.

This Privacy Notice explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights. This Privacy Notice applies to employees, former employees and all job applicants who are residents of the United States of America (including California), the UK, Switzerland or the European Economic Area ("**EEA**"). It also applies to personal information we collect from you regarding the emergency contacts and beneficiaries of employees. You agree that you have permission to provide such information to us.

For residents of California only: We are committed to complying with the California Consumer Privacy Act of 2018 (CCPA) as amended by the California Privacy Rights Act of 2020 (CPRA) and all applicable data privacy laws in the jurisdictions in which we have employees.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact us at [privacy@advancedtech.com](mailto:privacy@advancedtech.com).

**1. Personal information we collect and process**

We collect personal data about you when you apply for a job with us and during the recruitment process. How far you progress in the recruitment process will depend on the level of data that we collect. Your personal information will be collected either directly from you or indirectly from third parties.

- **Information that you provide directly**

We collect personal information directly from you when you choose to provide us with this information online and any subsequent communications between ourselves whether online or offline throughout the recruitment process. For example, when you provide information to us when applying for a job or using our employee on-boarding processes.

- **Information that we collect indirectly**

We collect personal information about you indirectly, including through automated means from your device when you use our website or visit our physical sites (via CCTV cameras). Some of the information we collect indirectly is captured using cookies and other tracking technologies, as explained further in the *Cookies and similar tracking technology* section below.

- **Information from third parties**

We also collect information about you from third party sources, i.e. our service providers that provide operational assistance, email, marketing and analytics services and social media platforms. Information received from third parties will be checked to ensure that the third party either has your consent or are otherwise legally permitted or required to disclose your personal information to us. For example, further personal information about you may be provided by recruiters, by referees or by agents that we use to conduct background checks (if required). Please note that we will only contact referees whose details you provide to us. We may also collect information about training and development from training providers and information about taxes from relevant authorities and payroll/accountancy partners.

For residents of California only: We collect information that identifies you, your household or your device or is reasonably capable of being connected with or linked to you, your household, or your device ("**Personal Information**"). Personal information does not include public information available from government records, de-identified or aggregated information or information that is protected by certain laws such as HIPAA for health related information and the Gramm-Leach Bliley Act (GLBA) for certain financial information.

The table below describes the categories of personal information we collect from and about you through our online application process and associated tracking systems.

Personal information description	Source
<b>Identifiers</b> , such as your first and last name, email address, mailing address, phone number, birth date, social security number, State or Federal identification numbers, driver's license number, passport and other government identification numbers, employee photos for identification badges and system profiles, emergency contact information including relationship to employee, marital status, and dependent and beneficiary information.	<ul style="list-style-type: none"> <li>• Directly from you (online or offline)</li> </ul>
<b>Personal Information Listed in the California Customer Records Statute</b> , including the above Identifiers, account information for payroll, reimbursement and benefits processing, and employment and employment history information.	<ul style="list-style-type: none"> <li>• Directly from you (online or offline)</li> </ul>

<p><b>Characteristics of Protected Classifications</b>, such as age, gender, voluntary self-disclosure information regarding minority, veteran and disability status, dependent and beneficiary information, ethnic origin and disability information.</p>	<ul style="list-style-type: none"> <li>• Directly from you (online or offline)</li> </ul>
<p><b>Commercial Information</b>, including financial data such as banking details, tax information, withholdings, salary, benefits, expenses, company allowances, stock and equity grants.</p>	<ul style="list-style-type: none"> <li>• Directly from you (online or offline)</li> <li>• Third parties</li> </ul>
<p><b>Internet or Other Electronic Network Activity Information</b>, such as cookies, domain name, browser type, operating system, usage data, IP address, search and browsing histories, login information, mobile device data, log files, and data collected through staff monitoring.</p>	<ul style="list-style-type: none"> <li>• Automatic collection</li> </ul>
<p><b>Geolocation Data</b>, being information that tells us from where you access our website if you are applying for a job or working remotely</p>	<ul style="list-style-type: none"> <li>• Automatic collection</li> </ul>
<p><b>Audio/Image Data</b>, such as CCTV / security camera footage, photographs or other images used for workplace initiatives and audio recordings used for workplace initiatives, voice mail services, etc.</p>	<ul style="list-style-type: none"> <li>• Directly from you (online)</li> <li>• Third parties</li> </ul>
<p><b>Professional or Employment-Related Information</b>, such as your résumé/CV, job title and duties, immigration and work authorization status, withholding tax information dependent and beneficiary information, pay information (e.g. pay rate and payroll deduction information), leave of absence information, other information necessary to administer benefits, performance management information (e.g. employment status (full-time or part-time, regular or temporary), work schedule, job assignments, hours worked, business travel information, expatriate and secondment assignments, accomplishments and awards, training and development information, performance evaluation information, discipline and counselling information, and employment termination information), health and safety information (e.g. health condition, job restrictions, drug testing information, workplace accident and illness information, and health insurance information), and employment history.</p>	<ul style="list-style-type: none"> <li>• Directly from you (online or offline)</li> <li>• Third parties</li> </ul>
<p><b>Non-public Education Information</b>, including educational information relevant to hiring qualifications.</p>	<ul style="list-style-type: none"> <li>• Directly from you (online or offline)</li> <li>• Third parties</li> </ul>
<p><b>Inferences Drawn from Other personal information</b>, being performance management information derived from other information above.</p>	<ul style="list-style-type: none"> <li>• Third parties</li> </ul>
<p><b>Opinion Information</b>, being any feedback provided by you in relation to your recruitment process or employment, for example in response to a survey.</p>	<ul style="list-style-type: none"> <li>• Directly from you (online or offline)</li> </ul>

<p><b>Biometric Information</b>, being information which is used to uniquely identify you and enable you to access ATS' sites and systems.</p>	<ul style="list-style-type: none"> <li>• Directly from you (online or offline)</li> </ul>
<p><u>For residents of California only:</u>  <b>Sensitive Personal Information</b>, including (as mentioned above) social security number, State or Federal identification numbers, racial or ethnic origin, religious beliefs, union membership, and information about health or sex life.</p> <p><u>For residents of the UK, Switzerland and EEA only:</u>  <b>Sensitive personal information</b>, including (as mentioned above) racial or ethnic origin, religious beliefs, union membership, criminal offence data, Biometric Information and information about health or sex life.</p>	<ul style="list-style-type: none"> <li>• Directly from you (online or offline)</li> </ul>

Some of the personal information that you provide may include sensitive personal information, such as health-related information or information about your race or ethnicity, which we need, for example and without limitation, for tax purposes and to comply with other legal and regulatory requirements; for the purposes of equal opportunities monitoring, to comply with anti-discrimination laws and for government reporting obligations; or to provide work-related accommodations, health, insurance, and other benefits to you and your dependents, or to manage absences from work.

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## 2. How we use your personal information (our purposes) and our legal basis for processing it

We use the personal information that we collect from and about you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your information. Depending on our purpose for collecting your information, we rely on one of the following legal bases:

- **Contract** - we require certain personal information in order to process job applications and provide and support employment contracts with us;
- **Consent** – in certain circumstances, we may ask for your consent (separately from any contract between us) before we collect, use, or disclose your personal information, in which case you can voluntarily choose to give or deny your consent without any negative consequences to you;
- **Legitimate interests** – we may use or disclose your personal information for the legitimate business interests of either ATS or a third party, but only when we are confident that your privacy rights will remain appropriately protected. If we rely on our (or a third party's) legitimate interests, these interests will normally be to: manage job applications and offers for positions with ATS; communicate with job applicants; review and improve our recruitment process; operate, provide and improve our business, including our website; communicate with you and respond to your questions; improve our website or use the insights to improve or develop marketing activities and promote our products and services; detect or prevent illegal activities (for example, fraud); and/or to manage the security of our IT infrastructure, and the safety and security of our employees, customers, vendors and visitors; or

- **Legal obligation** – there may be instances where we must process and retain your personal information to comply with laws or to fulfil certain legal obligations including in response to lawful requests by public authorities (such as for tax, immigration, health and safety, national security or law enforcement purposes); or to establish, exercise or defend against potential, threatened or actual legal claims.

The following table provides more details on our purposes for processing your personal information and the related legal bases. The legal basis under which your personal information is processed will depend on the data concerned and the specific context in which we collect it.

Where we require your data to pursue our legitimate interests, it will be in a way which is reasonable for you to expect as part of the running of our organization and which does not materially affect your rights and freedoms. We have identified below what our legitimate interests are.

Purpose/Activity	Type of data	Lawful basis for processing, including basis of legitimate interest
Processing your application and to contact you regarding your application, including identifying and evaluating candidates for potential employment.	<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Professional or Employment-Related Information</li> <li>• Non-public Education Information</li> <li>• Inferences Drawn from Other personal information</li> </ul>	<ul style="list-style-type: none"> <li>• Contract</li> <li>• Legitimate interests of ATS to manage job applications for positions with ATS</li> <li>• Legal obligation</li> </ul>
Recordkeeping in relation to recruiting and hiring, including previous applications to ATS.	<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Professional or Employment-Related Information</li> <li>• Non-public Education Information</li> <li>• Inferences Drawn from Other personal information</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests of ATS to manage job applications for positions with ATS</li> <li>• Legal obligation</li> </ul>
Improving our recruitment and hiring process and enhance our ability to attract successful candidates.	<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Inferences Drawn from Other personal information</li> <li>• Opinion information</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests of ATS to manage job applications for positions with ATS</li> </ul>
Ensuring compliance with legal requirements, including complying with applicable laws, complying with government requests for information, verifying your right to work in the relevant country, and diversity and inclusion requirements or practices.	<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Personal Information Listed in the California Customer Records Statute</li> <li>• Characteristics of Protected Classifications</li> <li>• Commercial Information</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests of ATS to ensure diversity of its workforce and equal opportunities</li> <li>• Legal obligation</li> <li>• Public Interest</li> </ul> <p>In relation to Sensitive personal information:</p>

	<ul style="list-style-type: none"> <li>Professional or Employment-Related Information</li> <li>Non-public Education Information</li> <li>Inferences Drawn from Other personal information</li> <li>Sensitive personal information</li> </ul>	<ul style="list-style-type: none"> <li>where the processing is necessary for the purposes of your or our obligations and rights in relation to employment in so far as it is authorised by law or collective agreement; or</li> <li>where the processing is necessary for the purpose of establishing, making or defending legal claims.</li> </ul>
Conducting criminal background checks as permitted by applicable law.	<ul style="list-style-type: none"> <li>Identifiers</li> <li>Personal Information Listed in the California Customer Records Statute</li> <li>Characteristics of Protected Classifications</li> <li>Commercial Information</li> <li>Professional or Employment-Related Information</li> <li>Non-public Education Information</li> <li>Inferences Drawn from Other personal information</li> <li>Sensitive personal information</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests of ATS to protect its business interests, ensure integrity of its staff and assess suitability of candidates for roles</li> <li>Consent</li> <li>Public Interest</li> </ul> <p>In relation to Sensitive Personal Data:</p> <ul style="list-style-type: none"> <li>Where you have given us your explicit consent to do so; or</li> <li>where the processing is necessary for the purpose of establishing, making or defending legal claims.</li> </ul>
Onboarding and managing employees, including allocation of work, performance reviews, promotions, succession planning, staffing, work management, processing business travel arrangements, managing leave requests, health and wellness programs, recreation, meals and dietary restrictions, accommodations and related requests, or otherwise.	<ul style="list-style-type: none"> <li>Identifiers</li> <li>Personal Information Listed in the California Customer Records Statute</li> <li>Characteristics of Protected Classifications</li> <li>Commercial Information</li> <li>Audio/Image Data</li> <li>Professional or Employment-Related Information</li> <li>Non-public Education Information</li> <li>Inferences Drawn from Other personal information</li> <li>Sensitive personal information</li> </ul>	<ul style="list-style-type: none"> <li>Contractual necessity</li> <li>Legitimate interests of managing its workforce and staff planning</li> </ul> <p>In relation to Sensitive Personal Data:</p> <ul style="list-style-type: none"> <li>Where the processing is necessary for the purposes of your or our obligations and rights in relation to employment in so far as it is authorised by law or collective agreement; or</li> <li>Where the processing is necessary for the purpose of establishing, making or defending legal claims.</li> </ul>

<p>Administering training and workforce learning and development, including providing compliance training, seminars, and awareness programs (including improving and developing our training materials for employees and our policies and procedures through surveys, questionnaires and feedback)</p>	<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Professional or Employment-Related Information</li> <li>• Non-public Education Information</li> <li>• Inferences Drawn from Other personal information</li> <li>• Opinion information</li> </ul>	<ul style="list-style-type: none"> <li>• Contractual necessity</li> <li>• Legitimate interests of developing the skillset of the ATS workforce, maintaining records of such training and performance.</li> </ul>
<p>Performing human resource functions, including manage your employment contract (i.e. including entering it, performing it, changing it and ending it) and maintaining appropriate business records.</p>	<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Personal Information Listed in the California Customer Records Statute</li> <li>• Commercial Information</li> <li>• Professional or Employment-Related Information</li> </ul>	<ul style="list-style-type: none"> <li>• Contract</li> <li>• Legal obligation</li> <li>• Legitimate interests to maintain records and details to support payroll, provide benefits information and assist budget planning</li> </ul> <p>In relation to Sensitive Personal Data:</p> <ul style="list-style-type: none"> <li>• Where you have provided your explicit consent;</li> <li>• where the processing is necessary for the purposes of your or our obligations and rights in relation to employment in so far as it is authorised by law or collective agreement; or</li> <li>• where the processing is necessary for the purpose of establishing, making or defending legal claims.</li> </ul>
<p>Providing references in connection with your finding new employment.</p>	<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Professional or Employment-Related Information</li> <li>• Non-public Education Information</li> <li>• Inferences Drawn from Other Personal Opinion Information</li> </ul>	<ul style="list-style-type: none"> <li>• Consent</li> <li>• Legitimate interests of data subjects, ATS and third parties in respect of workforce migration</li> </ul>
<p>Administering payroll, reimbursements, benefits, pension payments and trade union memberships.</p>	<ul style="list-style-type: none"> <li>• Identifiers</li> </ul>	<ul style="list-style-type: none"> <li>• Contract</li> <li>• Legal obligation</li> </ul>

	<ul style="list-style-type: none"> <li>• Personal Information Listed in the California Customer Records Statute</li> <li>• Commercial Information</li> <li>• Professional or Employment-Related Information</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests to maintain records and details to support payroll, provide benefits information and assist budget planning</li> </ul> <p>In relation to Sensitive Personal Data:</p> <ul style="list-style-type: none"> <li>• Where you have provided your explicit consent;</li> <li>• where the processing is necessary for the purposes of your or our obligations and rights in relation to employment in so far as it is authorised by law or collective agreement; or</li> <li>• where the processing is necessary for the purpose of establishing, making or defending legal claims.</li> <li>•</li> </ul>
Managing ATS as a business, including financial management, budgeting, business analytics and management reporting.	<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Professional or Employment-Related Information</li> <li>• Personal Information Listed in the California Customer Records Statute</li> <li>• Commercial Information</li> <li>• Opinion Information</li> </ul>	<ul style="list-style-type: none"> <li>• Legal obligations</li> <li>• Legitimate interests of running the ATS business effectively</li> </ul>
Day to day business operations including marketing, customer/client relations, support and service customers, providing news and updates on ATS products and services.	<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Professional or Employment-Related Information</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests of ATS for the running of its business, marketing services and providing products/services to clients</li> </ul>
Monitoring of diversity and equal opportunities	<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Characteristics of Protected Classifications</li> <li>• Sensitive personal information</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests of A to ensure diversity of its workforce and equal opportunities for employees / prospective employees</li> <li>• Consent</li> <li>• Public Interest</li> </ul>

		<p>In relation to Sensitive Personal Data:</p> <ul style="list-style-type: none"> <li>• where the processing is necessary for the purposes of your or our obligations and rights in relation to employment in so far as it is authorised by law or collective agreement; or</li> <li>• where the processing is necessary for the purpose of establishing, making or defending legal claims.</li> </ul>
<p>Supporting and managing your work and performance and any health concerns, including maintaining a safe workplace, assess your working capacity, administer health and Workers' Compensation insurance programs, and comply with applicable laws.</p>	<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Characteristics of Protected Classifications</li> <li>• Professional or Employment-Related Information</li> <li>• Sensitive personal information</li> </ul>	<ul style="list-style-type: none"> <li>• Contract</li> <li>• Legal obligation</li> <li>• Legitimate interests of running the ATS business effectively</li> </ul> <p>In relation to Sensitive Personal Data:</p> <ul style="list-style-type: none"> <li>• Where the processing is necessary for the purposes of your or our obligations and rights in relation to employment in so far as it is authorised by law or collective agreement;</li> <li>• where the processing is necessary for the purpose of establishing, making or defending legal claims; or</li> <li>• where the processing relates to data about you that you have made public.</li> <li>•</li> </ul>
<p>Maintaining the security of our premises, systems, staff and visitors including ensuring that employees properly log-in to our equipment and ensure that authorized employees have access to ATS' secured locations.</p>	<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Internet or Other Electronic Network Activity Information</li> <li>• Audio/Image Data</li> <li>• Biometric Information</li> </ul>	<ul style="list-style-type: none"> <li>• Legal obligation</li> <li>• Legitimate interests (specifically to ensure the security of ATS' systems, premises and staff)</li> </ul> <p>In relation to Sensitive Personal Data:</p> <ul style="list-style-type: none"> <li>• Where the processing is necessary for the</li> </ul>

		<p>purposes of your or our obligations and rights in relation to employment in so far as it is authorised by law or collective agreement; or</p> <ul style="list-style-type: none"> <li>• where the processing is necessary for the purpose of establishing, making or defending legal claims.</li> </ul>
<p>Monitoring and investigating compliance with policies, standards, procedures, rules and other legal requirements, including investigations, dealing with complaints and whistleblower reporting, vetting people against compliance lists where required by applicable law, conducting audits,</p>	<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Internet or Other Electronic Network Activity Information</li> <li>• Audio/Image Data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests of ATS to monitor compliance with its law, policies and procedures</li> </ul>
<p>Administering the use of information technology resources such as phones and electronic devices, software applications, global directory listings, files, electronic communications, hard-copy materials and other business resources to protect ATS, customer, and employee property, equipment and confidential information. We may also monitor employee performance and enforce ATS' electronic communications acceptable use employee policies.</p>	<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Internet or Other Electronic Network Activity Information</li> <li>• Audio/Image Data</li> <li>• Biometric Information</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests of ATS to monitor compliance with its law, policies and procedures, and to protect its property.</li> </ul> <p>In relation to Sensitive Personal Data:</p> <ul style="list-style-type: none"> <li>• Where the processing is necessary for the purposes of your or our obligations and rights in relation to employment in so far as it is authorised by law or collective agreement; or</li> <li>• where the processing is necessary for the purpose of establishing, making or defending legal claims.</li> </ul>
<p>Protecting our legal rights to the extent authorized or permitted by law.</p>	<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Personal Information Listed in the California Customer Records Statute</li> <li>• Characteristics of Protected Classifications</li> <li>• Commercial Information</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests of ATS to deal with such disputes and proceedings</li> <li>• Legal obligation</li> </ul> <p>In relation to Sensitive Personal Data:</p>

	<ul style="list-style-type: none"> <li>• Internet or Other Electronic Network Activity Information</li> <li>• Geolocation Data</li> <li>• Audio/Image Data</li> <li>• Professional or Employment-Related Information</li> <li>• Non-public Education Information</li> <li>• Inferences Drawn from Other Personal Opinion Information</li> <li>• Biometric Information</li> <li>• Opinion Information</li> <li>• Sensitive personal information</li> </ul>	<ul style="list-style-type: none"> <li>• Where the processing is necessary for the purposes of your or our obligations and rights in relation to employment in so far as it is authorised by law or collective agreement; or</li> <li>• where the processing is necessary for the purpose of establishing, making or defending legal claims.</li> </ul>
Emergency situations where the health or safety of one or more individuals may be endangered. This may include the provision of emergency medical care or emergency communications.	<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Characteristics of Protected Classifications</li> <li>• Biometric Information</li> <li>• Sensitive personal information</li> </ul>	<ul style="list-style-type: none"> <li>• Legal obligation</li> <li>• Legitimate interests of ATS to ensure safety and wellbeing of staff and others</li> <li>• Vital interests</li> </ul> <p>In relation to Sensitive Personal Data:</p> <ul style="list-style-type: none"> <li>• where the processing is necessary for the purposes of your or our obligations and rights in relation to employment in so far as it is authorised by law or collective agreement; or</li> <li>• where the processing is necessary for the purpose of establishing, making or defending legal claims.</li> </ul>

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### 3. How we share your personal information

We share your personal information with the following categories of recipients:

- **our group companies** (Advanced Technology Services, Inc., ATS Services, LLC, Harvard Distribution LLC, ATS Global, Inc, Advanced Technology Services UK, Ltd, ATS Advanced Technology Services

Canada, Inc, Advanced Technology Services Mexico, SDE RL DE CV. Servicios Administrativos Y De Personal ATS S De RL DE CV and ATS Mexico, LLC) who provide data processing services necessary to provide our goods and services (for example, to support the delivery of, provide functionality on, or help to enhance the security of our website), or who otherwise process personal information for purposes described in this Privacy Notice. Our group companies, to which we transfer your personal information, operate in the manufacturing industry;

- **third party service providers and partners** who provide data processing services to us as necessary to provide our goods and/or services (to support the delivery of, provide functionality on, or help to enhance the security of our website), or who otherwise process personal information for purposes that are described in this Privacy Notice. For example, these may include providers of data storage, shared services and recruitment platform providers, IT developers and support providers and providers of hosting services in relation to our vacancies website page, e.g., Greenhouse, Inc who provide our recruitment platform, Radancy who host our careers page.
- **third party services** when you use third party services linked through our Website, for example, background check service providers, your personal information will be collected by the provider of such services. Please note that when you use third party services, their own terms and privacy policies will govern your use of their services;
- any **competent law enforcement body, regulatory, government agency, court or other third party** (our professional advisers) where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person.  
For resident of California only: This includes the sharing of information in connection with a law enforcement request that is compliant with the California Electronic Communications Privacy Act. ;
- a **buyer** (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice; or
- any **other person with your consent** to the disclosure (obtained separately from any contract between us).

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#### 4. **Cookies and similar tracking technology**

We use cookies and similar tracking technology (collectively, “**Cookies**”) to collect and use personal information about you. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie Notice [[link](#)].

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#### 5. **How we keep your personal information secure**

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures are designed to provide a level of security appropriate to the risk of processing your personal information. Specific measures we use include encrypting your personal information in transit and at rest; an Information Security program leveraging an industry standard framework; employing advanced malware protections; implementation of other reasonable security defenses including vulnerability management, access management, and recovery/resilience measures.

Where you have created an account with us that uses a unique password to enable you to access our website, it is your responsibility to keep this password secure and confidential.

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## 6. International data transfers

In some cases, where your personal information is transferred to ATS group companies or third parties, it is processed in countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

Specifically, our website servers are located in the USA, Germany and Ireland, and our group companies in the US, Mexico, Canada and the United Kingdom. Our third party service providers and partners operate around the world. This means that when we collect your personal information we will process it in any of these countries.

For residents of the UK Switzerland and EEA only:

Where we transfer your personal information to countries and territories outside of the European Economic Area and the UK, which have been formally recognised as providing an adequate level of protection for personal information, we rely on the relevant “adequacy decisions” from the European Commission and “adequacy regulations” (data bridges) from the Secretary of State in the UK. We transfer personal information between the European Economic Area and the UK in reliance on the European Commission's adequacy decision for the UK ([decision on the adequate protection of personal data by the united kingdom - general data protection regulation en.pdf \(europa.eu\)](#)) and the Secretary of State's adequacy regulations for the EEA .

Where the transfer is not subject to an adequacy decision or regulations, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Notice and applicable laws. The safeguards we use to transfer personal data are in case of both our group companies and third party service providers and partners, the [European Commission's Standard Contractual Clauses](#) as issued on 4 June 2021 under Article 46(2) using the relevant modules applicable to the transfer, including the UK Addendum for the transfer of data originating in the UK.

Our Standard Contractual Clauses entered into by our group companies and with our third party service providers and partners can be provided on request. Please note that some sensitive commercial information may be redacted from the Standard Contractual Clauses.

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## **7. How Long We Retain Your Personal Information**

Personal information will be stored in accordance with applicable laws and kept as long as needed to carry out the purposes described in this Privacy Notice or as otherwise required by applicable law. Generally, this means your personal information will be retained until the end of your employment, employment application, or work relationship with us plus a statutorily required or reasonable period of time thereafter to respond to government agency requests/audits, employment or work-related inquiries, or to deal with any legal matters (e.g. judicial or disciplinary actions), document the proper termination of your employment or work relationship, or to provide you with ongoing benefits.

The specific retention periods depend on the nature of the information and why it is collected and processed and the nature of the legal requirement. For example: We keep your information when we have a legal obligation to do so (for example if a court order is received about your job applicant account, we would retain your data for longer than the usual retention period when an account is deleted); to deal with and resolve requests and complaints (for example, if there is an ongoing complaint with respect to your recruitment journey, but you had closed your applicant account), to protect individuals' rights and property (for example we will retain information about a data subject access request for 1100 days after the request is dealt with in case there is a subsequent complaint and the information is needed to demonstrate how the request was handled) and for litigation or regulatory matters (for example we would retain your information if there was an ongoing legal claim and the information was relevant to the claim. This information would be retained until the legal claim had been concluded).

When we have no ongoing legitimate business need or legal reason to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

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## **8. Your data protection rights**

For residents of California only:

The California Consumer Privacy Act ("CCPA") grants State of California residents the following rights, to:

- 1) Know what personal information is being collected about you;
- 2) Know whether their personal information is sold or disclosed and to whom;
- 3) Say no to the sale of your personal information;
- 4) Access your personal information;
- 5) Have your personal information deleted;
- 6) Have your personal information corrected or updated; and
- 7) Have the right to equal service and price, even if you exercise your privacy rights under this law.

In addition, you can object to processing of your personal information, ask us to restrict processing of your personal information, ask us to limit the processing of Sensitive personal information, or request portability of your personal information. You can exercise these rights by contacting us using the contact details provided at the end of this Privacy Notice.

If we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

You may complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

For residents of the UK Switzerland and EEA only:

You may exercise the rights available to you under applicable data protection laws as follows:

- If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us at [privacy@advancedtech.com](mailto:privacy@advancedtech.com).
- You can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us at [privacy@advancedtech.com](mailto:privacy@advancedtech.com).
- If we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a relevant data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. (Contact details for the UK Information Commissioner's Office are [here](#).)

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

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## **9. Updates to this Privacy Notice**

This Privacy Notice may be updated periodically to reflect any necessary changes in our privacy practices. In such cases, if the changes are material, we will inform you via email and on our intranet. We will post updates to this notice for job applications on the portion of our website listing open positions. We will obtain

your consent to any material Privacy Notice changes if, and where, required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.

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## **10. Who Do I Contact for More Information?**

If you have any questions or concerns regarding this Privacy Notice or the collection of your personal information, please contact:

privacy@advancedtech.com

*Last updated: 5/19/2023*