



[www.TheFountainGroup.com](http://www.TheFountainGroup.com)

4505 Woodland Corporate Blvd

Suite 200

Tampa, FL 33614

## Employee Privacy Policy

### Introduction

At The Fountain Group we are committed to maintaining the accuracy, confidentiality and security of your personal information. This Privacy Policy describes the personal information that The Fountain Group collects from or about you, and how we use and to whom we disclose that information.

### Policy of Compliance

It is The Fountain Group's policy to comply with the privacy legislation within each jurisdiction in which we operate. Sometimes the privacy legislation and / or an individual's right to privacy are different from one jurisdiction to another. This Privacy Policy was developed to guide the activities of The Fountain Group. In addition, specific privacy practices may be adopted to address the specific privacy requirements of particular jurisdictions.

This Privacy Policy has a limited scope and application and the rights and obligations contained in this Privacy Policy may not be available to all individuals or in all jurisdictions.

### What is Personal Information?

For the purposes of this Privacy Policy, personal information is any information about an identifiable individual, other than the person's business title or business contact information when used or disclosed for the purpose of business communications. Personal information does not include anonymous or non-personal information (i.e., information that cannot be associated with or tracked back to a specific individual).

### What Personal Information Do We Collect?

We collect and maintain different types of personal information in respect of those individuals who seek to be, are, or were employed by us, including the personal information contained in:

- resumes and/or applications;
- references and interview notes;
- photographs and video;
- letters of offer and acceptance of employment;
- mandatory policy acknowledgement sign-off sheets;
- payroll information; including but not limited to social insurance number, and pay check deposit information;
- wage and benefit information;



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- forms relating to the application for, or in respect of changes to, employee health and welfare benefits; including, short term disability, medical and dental care; and
- Beneficiary and emergency contact information.

In addition to the examples listed above, personal information also includes information such as name, home address, telephone, personal email address, date of birth, employee identification number and marital status, and any other information necessary to The Fountain Group's business purposes, which is voluntarily disclosed in the course of an employee's application for and employment with The Fountain Group.

As a general rule, The Fountain Group collects personal information directly from you. In most circumstances where the personal information that we collect about you is held by a third party, we will obtain your permission before we seek out this information from such sources. From time to time, we may utilize the services of third parties in our business and may also receive personal information collected by those third parties in the course of the performance of their services for us or otherwise. Where this is the case, we will take reasonable steps to ensure that such third parties have represented to us that they have the right to disclose your personal information to us.

Where permitted or required by applicable law or regulatory requirements, we may collect information about you without your knowledge or consent.

### **Why Do We Collect Personal Information?**

The personal information collected is used and disclosed for our business purposes, including establishing, managing or terminating your employment relationship with The Fountain Group. Such uses include:

- determining eligibility for initial employment, including the verification of references and qualifications;
- administering pay and benefits;
- Processing employee work-related claims (e.g. worker compensation, insurance claims, etc.)
- establishing training and/or development requirements;
- conducting performance reviews and determining performance requirements;
- assessing qualifications for a particular job or task;
- gathering evidence for disciplinary action, or termination;
- establishing a contact point in the event of an emergency (such as next of kin);
- complying with applicable labor or employment statutes;
- compiling directories;
- ensuring the security of company-held information; and
- such other purposes as are reasonably required by The Fountain Group.



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## **How Do We Use Your Personal Information?**

We may use your personal information:

- for the purposes described in this Privacy Policy; or
- for any additional purposes that we advise you of and where your consent is required by law we have obtained your consent in respect of the use or disclosure of your personal information.

We may use your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

## **When Do We Disclose Your Personal Information?**

We may share your personal information with our employees, clients, and other parties who require such information to assist us with establishing, managing or terminating our employment relationship with you, including:

- Clients who may have job opportunities available or interest in placing our candidates;
- With service providers, who are only authorized to use information to perform services on our behalf or for limited administrative purposes, such as complying with legal requirements, or to perform pre-employment services, such as background screenings;
- When we believe disclosure is appropriate to prevent physical harm or financial loss;
- When reasonably necessary to an investigation of suspected or actual illegal activity;

When we share personal information with such parties we typically require that they only use or disclose such personal information in a manner consistent with the use and disclosure provisions of this Privacy Policy.

Further, your personal information may be disclosed:

- required by applicable law or regulatory requirements. In such a case, we will endeavor to not disclose more personal information than is required under the circumstances;
- to comply with valid legal processes such as search warrants, subpoenas or court orders;
- as part of The Fountain Group's regular reporting activities to other members of The Fountain Group;
- to protect the rights and property of The Fountain Group;



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- during emergency situations or where necessary to protect the safety of a person or group of persons;
- where the personal information is publicly available; or
- with your consent where such consent is required by law.

### **Notification and Consent**

Privacy laws do not generally require The Fountain Group to obtain your consent for the collection, use or disclosure of personal information for the purpose of establishing, managing or terminating your employment relationship. In addition, we may collect, use or disclose your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

To the extent that your consent is required, we will assume, unless you advise us otherwise, that you have consented to The Fountain Group's collecting, using and disclosing your personal information for the purposes stated above (including any other purposes stated or reasonably implied at the time such personal information was provided to us).

Where your consent was required for our collection, use or disclosure of your personal information, you may, at any time, subject to legal or contractual restrictions and reasonable notice, withdraw your consent. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Customer Service Dept.

### **How is Your Personal Information Protected?**

The Fountain Group endeavors to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, copying, use, modification or disclosure.

### **How Long is Your Personal Information Retained?**

Except as otherwise permitted or required by applicable law or regulatory requirements, The Fountain Group endeavors to retain your personal information only for as long as it believes is necessary to fulfill the purposes for which the personal information was collected (including, for the purpose of meeting any legal, accounting or other reporting requirements or obligations). We may, instead of destroying or erasing your personal information, make it anonymous such that it cannot be associated with or tracked back to you.

### **Updating Your Personal Information**

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of your employment, please keep us informed of such changes.



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### **Interpretation of this Privacy Policy**

Any interpretation associated with this Privacy Policy will be made by the Compliance Officer. This Privacy Policy includes examples but is not intended to be restricted in its application to such examples, therefore where the word 'including' is used, it shall mean 'including without limitation.

This Privacy Policy does not create or confer upon any individual rights, or impose upon The Fountain Group's rights or obligations outside of, or in addition to, any rights or obligations imposed by the privacy laws applicable to such individual's personal information. Should there be, in a specific case, any inconsistency between this Privacy Policy and such privacy laws, this Privacy Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.