

global privacy notice risesmart.

introduction

This privacy notice applies to the processing of personal data we process about you when we provide our Services to you: outplacement, coaching, internal mobility, career transition counselling, career development counselling, training and consultancy services etc., including when you visit our Risesmart websites or use our mobile app.

Your privacy and the security of your personal data is important to Randstad Risesmart and the rest of the Randstad Group companies. We are responsible for ensuring that all personal data entrusted to us is processed in accordance with applicable data protection legislation.

This notice explains who we are, for what purposes we may use your personal data, how we handle it, to whom we may disclose it (like service providers and/or other Randstad Group Companies), where it may be transferred to or accessible from, and what your rights are.

about Randstad Risesmart

Shanghai Talent Co., Ltd. (referred to in this notice as: “we” or “us” or “Risesmart”), will process your personal data in accordance with this data protection notice (such personal data sometimes also referred to as “information”).

Shanghai Talent Co., Ltd., 19/F, Central Park, 329 Hengfeng Road, Jing'an District, Shanghai

Except as otherwise set out below, Risesmart is the controller of the personal data (‘controller’ within the meaning of applicable data protection legislation).

What personal data do we process about you and why

As a participant in our Services, we collect and process the following personal data about you as described below:

Purpose(s) for processing	Categories of personal data	Legal basis for processing
To invite you to your program: if provided by your employer or yourself, we will process your personal data to invite you to make use of our Services.	Identification and contact data: your name, work or personal email address, phone number, job title (to the extent provided)	Necessary for the conclusion or performance of a contract to which you are a party, or with your consent.
To provide our coaching Services to you: we will process your personal data to connect you with coaches, and to provide	Identification and contact data: your name, work or personal email address, phone number,	Necessary for the conclusion or performance of a contract to which you are a party. As

you with tools and resources to support your development at work. This includes skill assessments, addressing your challenges and understanding your personal strengths and weaknesses, and to help you identify areas of personal development.	country of residence, languages spoken, and other similar information as shared by you Professional information: personal data related to your work including information like your job title, description and location, your department, and other similar information as shared by you CV information: CV/resume, work history, information about your skills, your experience and educational background and other relevant information present on your CV or as shared by you Assessment and exercises information: information and/or responses provided by you, including recordings, when you take part in assessments, quizzes, exercises, and their results	this involves the processing of sensitive personal information, we will obtain your separate consent in accordance with the law.
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To provide our outplacement Services to you: we will process your personal data to connect you with coaches, and to provide you tools and resources to support you in finding new employment. This includes providing you with skill assessments, addressing challenges and understanding your personal strengths and weaknesses, resume/CV support by a certified Branding Expert, tailored job leads and (provided you opt in) our FirstLook functionality, and personal development support.	Identification and contact data: your name, work or personal email address, phone number, country of residence, languages spoken, and other similar information as shared by you Professional information: personal data related to your work including information like your job title, description and location, your department, and other similar information as shared by you CV information: CV/resume, work history, information about your skills, your experience and educational background and other relevant information present on your CV or as shared by you Assessment and exercises information: information and/or responses provided by you, including recordings, when you take part in assessments, quizzes, exercises, and their results	Necessary for the conclusion or performance of a contract to which you are a party. As this involves the processing of sensitive personal information, we will obtain your separate consent in accordance with the law.
To provide our redeployment Services to you: we will process your personal data to provide you with career coaching and to match your goals, skills, and experience with new relevant opportunities with your employer.	Identification and contact data: your name, work or personal email address, phone number, country of residence, languages spoken, and other similar information as shared by you Professional information: personal data related to your work including information like your job title, description and location, your department, and other similar information as shared by you CV information: personal data on or about your CV/resume, work history, information about your skills, your experience and educational background and other relevant information present on your CV or as shared by you Assessment and exercises information: information and/or responses provided by you, including recordings, when you take part in	Necessary for the conclusion or performance of a contract to which you are a party. As this involves the processing of sensitive personal information, we will obtain your separate consent in accordance with the law.

	assessments, quizzes, exercises, and their results	
To manage our Services: we will process your personal data to manage your program, to report on your program status to our client, and to invoice our client.	Identification information: your name Program information: personal data about the type of program provided to you, information about coaching sessions, events, webinars etc. you have attended and your use of our platform, your program status	Necessary for the conclusion or performance of a contract to which you are a party.
When you use or otherwise visit them, we use your personal data to manage our website and mobile app, and for system administration purposes (e.g., diagnosing technical problems, analyzing the traffic to our website).	Device Usage Data: Internet Protocol (IP) address of your device, IP address of your Internet Service Provider, device screen resolution, device type (unique device identifiers), browser and operating system versions, geographic location (country/city), preferred language used to display, date and time of access to the website, internet address from which you were directly linked through to our website, operating system that you use, parts of the website that you visit, pages of the website that you have visited and the information that you viewed, actions you have performed	(a) Obtaining your authorized consent; (b) Necessary for providing you with stable website and application services, and conducting system security operations, maintenance, and fault diagnosis.
When you use or otherwise visit them, we use your personal data for web and app analytics, in order to optimize the user experience (analyzing the way our pages are visited, analyzing trends, observing and measuring how our visitors engage with our website) and the quality of the content provided to you.	Device Usage Data: Internet Protocol (IP) address of your device, IP address of your Internet Service Provider, device screen resolution, device type (unique device identifiers), browser and operating system versions, geographic location (country/city), preferred language used to display, date and time of access to the website, internet address from which you were directly linked through to our website, operating system that you use, parts of the website that you visit, pages of the website that you have visited and the information that you viewed, actions you have performed, material that you send to or download from our website or app	(a) Obtaining your authorized consent; (b) Necessary for ensuring the stable operation of the website and applications, improving service quality, and optimizing user interaction experience.
We process your data where required for compliance with regulatory requirements like tax laws.	Personal data limited to what is required for the regulatory requirement.	Processing is necessary for compliance with a legal obligation.

Surveys (including satisfaction surveys): we may process your personal data to ask your opinion about our Services	Identification and contact information: your name and email address	(a) Obtaining your authorized consent; (b) Necessary for optimizing our products or services, improving user experience, and maintaining good customer relationships.
IT and operational support: we will process your personal data when providing you with IT, application, and/or operational support	Identification data: your name, user ID, email address, and any other personal data as required to resolve your support request.	(a) Obtaining your authorized consent; (b) Necessary for providing you with appropriate support during your project period.
IT security: we will process your personal data to ensure the security of our information assets by for example logging and monitoring actions	Information related to your usage of our website and/or mobile application like your user ID, Internet Protocol (IP) address of your device, login times, and actions that you have performed	Necessary for the fulfillment of statutory duties or legal obligations.
Facilities, security and contingency planning purposes	Identification and contact data: your name, your contact details (like your phone number) if required Visitor information: when accessing our buildings, we may collect your name, contact details, car plate number, identification, etc. for security reasons. Where we are legally permitted to do so we may also ask you to disclose information about your health (including information related to viral infections, flu, etc.) for health and safety reasons. CCTV footage: we may process footage of you obtained through our use of CCTV surveillance systems.	As this involves the processing of sensitive personal information, we will obtain your separate consent in accordance with the law; or necessary for responding to public health emergencies, or for protecting the life, health, and property safety of natural persons in emergencies.
For business management and management reporting: we will use your personal data to build insights into our service delivery, to develop business	We will aggregate your personal data (like your program status and related information) so that you are not personally identifiable.	We have legitimate grounds to organize and understand our business. (This law does not apply if the data has been fully anonymized); for data that has

forecasting, and to provide reporting to our management		not been fully anonymized, it is processed based on what is necessary to provide you with services (performance of a contract), or with your consent.
To conduct corporate transactions (including mergers, acquisitions and divestments)	Your personal data as required and limited to what is necessary to conduct such corporate transactions.	Necessary for the development of Randstad's business (including mergers, acquisitions, and divestitures), as well as for the performance of relevant legal procedures and legal obligations; we will inform you of the name and contact information of the recipient in accordance with the law before the transfer occurs.
Dispute management and litigation	Legal/Dispute Data: Personal data limited to what law enforcement authorities require us to disclose in connection with an investigation. Personal data limited to what is necessary for Randstad to defend its rights in connection with a dispute or with proceedings before a court of law (or other dispute resolution body).	Necessary for the fulfillment of statutory duties or legal obligations, as well as for legally exercising, asserting, or defending Randstad's legal rights (including handling legal claims or disputes with customers and other third parties).

Our cookies and similar technologies

When you visit our website or a Risesmart app, we collect some information related to your device, your browser and to the way you navigate our content. We may use cookies to collect this personal data.

Cookies are small text files that are saved on your device when you visit our website or app. Cookies and similar technologies (like tokens) enable the website and app to remember your actions and preferences (for example, your choice of language) and recognize you when you return, so that we may analyze trends, determine your areas of interest and administer our website and app in order to speed up the navigation process and to make your site experience more efficient.

Please find more information on the cookies we use, for what purpose and further settings for configuring or deleting cookies in our cookie notice which you can find in the footer of our website.

AI technologies

our use of innovative AI technologies for Risesmart services

Our ultimate goal is to support people and organizations in realizing their true potential. We believe that the best way to achieve that goal is by combining our passion for people with the power of today's AI technologies. By AI technologies we mean technologies that help us digitize and enhance a variety of our processes. For example, we use AI to provide you with easy summaries of our career-related content, or to support you in practicing interviews.

responsible use of AI technologies

Randstad is committed to the ethical and responsible use of innovative AI technologies (you can read our AI principles [here](#)). Randstad does not use these technologies as a substitute for humans or human interaction in any part of its processes. Instead, our use of AI technologies is intended to make interactions with clients and participants more personal, relevant and meaningful.

How long we keep your personal data

As a general rule, we will not keep your personal data for longer than necessary. When your personal data is no longer necessary for the purpose for which it was being processed, we will delete or otherwise deidentify or mask it.

We keep personal data once you have completed your program and for as long as you continue logging in to our website or mobile app. If you haven't logged in for two years and that you don't respond to our invitation to log back in, we will delete or otherwise mask personal data associated with your profile and your program (like your identification details, assessment results, CVs or resumes ...).

We will also keep your personal data longer if necessary in connection with any actual or potential dispute (e.g. we need this personal data to establish or defend legal claims), in which case we will keep your personal data until the end of such dispute; and/or for us to comply with any legal or regulatory obligation (e.g. for tax purposes), in which case we will keep your personal data for as long as required by that obligation.

with whom we share your personal data

We may share your personal data with:

Randstad Group Entities:

- with other entities of the Randstad group of companies. We are part of a multinational group of companies and sometimes we may share personal data with other Randstad groups of companies for the purposes of efficient management of business, compliance with legal and regulatory requirements and to provide our Services to you and to our clients. For an overview of these entities, click [here](#).

Our "[partner for talent](#)" strategy focuses on building long-term relationships with clients and talents, understanding their unique challenges, and delivering tailored solutions to help them thrive in a dynamic global talent market. We leverage data, technology, and our deep industry expertise to connect the right talent with the right opportunities.

External partners for service delivery:

- with Randstad clients. Within the scope of our Services.
- with Risesmart coaches. Some of our coaches support our Services on an independent or freelance basis.
- with third party providers of IT-related services (e.g. we use an external provider to support our IT-infrastructure; e.g. an important part of our software and databases sit in a cloud-environment which is operated by a third party service provider).
- with providers of professional services (e.g. to our auditors, our tax advisors, our legal advisors).

Public and Regulatory Authorities:

- with public authorities (e.g. pursuant to applicable law we may need to disclose personal data to tax authorities).
- with law enforcement authorities, courts and regulatory authorities (e.g. as part of a criminal investigation police services may require us to disclose personal data to them).

We may also disclose your personal data to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; or
- if all or a substantial part of our assets are acquired by a third party, in which case the personal data that we hold about you may be one of the transferred assets.

When we share your personal data as described above, such personal data may be transferred both within and outside the European Economic Area (EEA).

In the event that we transfer your personal data internationally, we will only do so in line with applicable law, and we will require that there is an adequate level of protection for your personal data, and that appropriate security measures are in place.

Your personal data may be transferred from countries located within the EEA to countries located outside of the EEA (such as the United States). In such cases, we will require that the following safeguards are observed:

- The laws of the country to which your personal data is transferred ensure an adequate level of data protection. Click [here](#) for the list of non-EEA countries that, according to the European Commission, provide an adequate level of data protection; or
- The transfer is subject to standard data protection clauses approved by the European Commission. More information about those data protection clauses is available [here](#); or
- Any other applicable appropriate safeguards under article 46 of the EU General Data Protection Regulation (2016/679).

For more information about the safeguards that we have implemented to protect your personal data internationally, please contact us at privacy@cn.randstad.com.

how we will protect your personal data

We have technical and organizational security measures in place to protect your personal data from being accidentally lost, used, altered, destructed, disclosed or accessed in an unauthorized way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your personal data are governed by Randstad's rules for information and IT security, data protection and other internal regulations and guidelines applicable to the processing of personal data.

While we have measures in place to protect your personal data, it is important for you to understand that 100% complete security cannot be guaranteed. Accordingly, we have procedures in place to deal with data security incidents and to comply with legal requirements applicable to the detection, handling and notification of personal data breaches.

your data protection rights

While your specific data protection rights will depend on applicable data protection law, they may include the following:

Rights	What does this mean?
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1. Right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights. This is why we are providing you with the information in this notice.
2. Right of access	You have the right to access the personal data we keep about you – this is because we want you to be aware of the personal data we have about you and to enable you to verify whether we process your personal data in accordance with applicable data protection laws and regulations.
3. Right to rectification	If your personal data is inaccurate or incomplete, you have the right to request the rectification of your personal data.
4. Right to erasure	This is also known as ‘the right to be forgotten’ and, in simple terms, enables you to request the deletion or removal of your personal data where there is no compelling reason for us to keep it. This is not a general right to erasure, there are exceptions.
5. Right to restrict processing	You have rights to ‘block’ or suppress further use of your personal data in certain circumstances. When processing is restricted, we can still store your personal data, but may not use it further. We keep lists of people who have asked for further use of their personal data to be ‘blocked’ to make sure the restriction is respected in future.
6. Right to data portability	You have the right to obtain and reuse your personal data in a structured, commonly used and machine-readable format in certain circumstances. In addition, where certain conditions apply, you have the right to have such personal data transferred directly to a third party.
7. Right to object to processing	You have the right to object to certain types of processing, in certain circumstances. In particular, the right to object to the processing of your personal data based on our legitimate interests or on public interest grounds; the right to object to processing for direct marketing purposes (including profiling); the right to object to the use of your personal data for scientific or historical research purposes or statistical purposes in certain circumstances.
8. Right to withdraw consent	If our processing of your personal data is based specifically on your consent, you have the right to withdraw that consent at any time.

You can exercise your rights by privacy@cn.randstad.com

We may ask you for proof of identity to ensure that we are not sharing your personal data with anyone else but yourself.

Please be aware that, in particular cases (for instance, due to legal requirements) we may not be able to make your request effective.

You have the right to lodge a complaint with a supervisory data protection authority: the Cyberspace Administration of China (CAC) or other relevant competent industry authorities.

changes to this privacy notice

We may update this notice from time to time. You can see the date on which the last change was made below in this notice. We advise you to review this notice on a regular basis so that you are aware of any changes.

contact us

If you have any questions about this notice or any privacy concerns, please contact us at privacy@cn.randstad.com.

This notice was updated on: 30/06/2026