



PRIVACY NOTICE

Skillfinder International ("We") are committed to protecting and respecting your privacy and personal data.

Our Group means our subsidiaries, our ultimate holding company and its subsidiaries, our associated companies as defined in section 1159 of the UK Companies Act 2006 (our Group).

This Privacy Notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be used by us.

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a new regulation which replaces the Data Protection Regulation (Directive 95/46/EC). The Regulation aims to harmonise data protection legislation across EU member states, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

This Privacy Notice explains how we use your personal data, whether we are in the process of helping you find a job, continuing our relationship with you once we have found you a role, providing you with a service, receiving a service from you, using your data to ask for your assistance in relation to one of our candidates, or you are visiting our website.

It describes how we collect and use your personal data, and how, in doing so, we comply with our legal obligations to you.

This Privacy Notice applies to the personal data of our website users, candidates, clients, suppliers, and other people whom we may contact in order to find out more about our candidates or those whom they indicate as emergency contacts.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of data protection legislation in force from time to time the data controller is **Skillfinder S.A.R.L.** of 17 rue Glesener, L-1631 Luxembourg.

Our nominated representative is **Tracey Stone, Operations & Contracts Manager.**

Who we are and what we do

We are a recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 (our business). We collect the personal data of the following types of people to allow us to undertake our business;

- prospective and placed candidates for permanent or contract roles;
- prospective and live client contacts;
- supplier contacts to support our services;
- employees and consultants.



We collect information about you to carry out our core business and supplementary activities.

Information you give to us or we collect about you

This is information about you that you give us by filling in forms on our site www.skillfindergroup.com (our site) or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, to enter our database, subscribe to our services, attend our events, participate in discussion boards or other social media functions on our site, including surveys, and when you report a problem with our site.

The information you give us or we collect about you may include your name, address, private and corporate e-mail address and phone number, financial information, compliance documentation and references verifying your qualifications and experience and your right to work in the United Kingdom, curriculum vitae and photograph, links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website.

Information we collect about you when you visit our website

With regard to each of your visits to our site we will automatically collect the following information:

technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information if applicable, browser type and version;

we use Google Analytics to gather information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), page response times, and page interaction information.

Information we obtain from other sources

This is information we obtain about you from other sources such as LinkedIn, corporate websites, job board websites, online CV libraries, your business card and personal recommendations. In this case we will inform you, by sending you this Privacy Notice, within a maximum of 30 days of collecting the data of the fact we hold personal data about you, the source the personal data originates from and whether it came from publicly accessible sources, and for what purpose we intend to retain and process your personal data.

We are working closely with third parties including companies within our Group, business partners, sub-contractors in technical, professional, payment and other services, advertising networks, analytics providers, search information providers, credit reference agencies, and professional advisors. We may receive information about you from them for the purposes of our recruitment services and supplementary services.



Purposes of data collection and the legal basis for maintaining the data

We use information held about you in the following ways:

To carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us and to provide you with the information, products and services that you request from us or we think will be of interest to you because it is relevant to your career or to your organisation.

To provide you with information about other services we offer that are similar to those that you have already been provided with or enquired about.

The core service we offer to our candidates and clients is the introduction of candidates to our clients for the purpose of contract and permanent engagement. However, our service expands to supporting individuals throughout their career and to supporting businesses' resourcing needs and strategies.

Our legal basis for the processing of personal data is our legitimate business interests, described in more detail below, although we will also rely on contract, legal obligation and consent for specific uses of data.

We will rely on contract if we are negotiating or have entered into a placement agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.

We will rely on legal obligation if we are legally required to hold information on to you to fulfil our legal obligations.

We will in some circumstances rely on consent for particular uses of your data and you will be asked for your express consent, if legally required. Examples of when consent may be the lawful basis for processing include permission to introduce you to a client (if you are a candidate).

Our Legitimate Business Interests

Our legitimate interests in collecting and retaining your personal data are described below:

As a recruitment business and recruitment agency we introduce candidates to clients for permanent employment, or independent professional contracts. The exchange of personal data of our candidates and our client contacts is a fundamental, essential part of this process.

In order to support our candidates' career aspirations and our clients' resourcing needs we require a database of candidate and client personal data containing historical information as well as current resourcing requirements.



Candidate Data

To maintain, expand and develop our business we need to record the personal data of prospective candidates. Depending on the relevant circumstances and applicable local laws and requirements, we may collect some or all of the information listed below to enable us to offer you employment opportunities which are tailored to your circumstances and your interests. In some jurisdictions, we are restricted from gathering some of the data outlined below. In such cases, we will not process the data in those jurisdictions:

- name;
- age/date of birth;
- sex/gender;
- photograph;
- marital status;
- contact details;
- education details;
- employment history;
- emergency contacts and details of any dependants;
- referee details;
- immigration status (whether you need a work permit);
- nationality/citizenship/place of birth;
- a copy of your driving licence and/or passport/identity card;
- financial information (where we need to carry out financial background checks);
- social security number (or equivalent in your country) and any other tax-related information;
- diversity information including racial or ethnic origin, religious or other similar beliefs, and physical or mental health, including disability-related information;
- details of any criminal convictions if this is required for a role that you are interested in applying for;
- details about your current remuneration, pensions and benefits arrangements;
- information on your interests and needs regarding future employment, both collected directly and inferred, for example from jobs viewed or articles read on our website;
- extra information that you choose to tell us;
- extra information that your referees choose to tell us about you;
- extra information that our clients may tell us about you, or that we find from other third party sources such as job sites;
- IP address;
- the dates, times and frequency with which you access our services.

Please note that the above list of categories of personal data we may collect is not exhaustive.

Client Data

The data we collect about clients is very limited. We generally only require contact details or the details of individual contacts at your organisation (such as their names, telephone numbers and email addresses) to enable us to ensure that our relationship runs smoothly. We also hold information relating to your online engagement with our candidates.



Consent

Should we want or need to rely on consent to lawfully use your data we will request your consent orally, by email or by an online process for the specific activity we require consent for and record your response on our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.

Other uses we will make of your data

Use of our website;

- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer;
- marketing activities;

We will use this information:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

We do not undertake automated decision making or profiling. We do use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision making process.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

What is a Cookie and how do we use them?

A "cookie" is a bite-sized piece of data that is stored on your computer's hard drive. They are used by nearly all websites and do not harm your system. We use them to track your activity to help ensure you get the smoothest possible experience when visiting our website. We can use the information from cookies to ensure we present you with options tailored to your preferences on your next visit. We can also use cookies to analyse traffic and for advertising purposes.



If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings. We also provide information about this in our Marketing preferences page on Skillfinder International's website(s).

Disclosure of your information inside and outside of the EEA

We may share your personal information with:

Any member of our group both in the EEA and outside of the EEA.

Selected third parties including:

- clients for the purpose of introducing candidates to them ;
- candidates for the purpose of arranging interviews and engagements;
- clients, business partners, suppliers and sub-contractors for the performance and compliance obligations of any contract we enter into with them or you;
- analytics and search engine providers that assist us in the improvement and optimisation of our site;
- CV verification and background screening companies, credit reference agencies, our insurance broker, compliance partners and other sub-contractors for the purpose of assessing your suitability for a role where this is a condition of us entering into a contract with you.

We may disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- if **Skillfinder S.A.R.L.** or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of **Skillfinder S.A.R.L.**, any of its subsidiaries, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

The lawful basis for the third party processing will include:

- their own legitimate business interests in processing your personal data, in most cases to fulfil their internal resourcing needs;
- satisfaction of their contractual obligations to us as our data processor;
- for the purpose of a contract in place or in contemplation;
- to fulfil their legal obligations.



Where we store and process your personal data

It is our policy to store the data that we collect from you within the EEA, but in exceptional circumstances it may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may be transferred to third parties outside of the EEA for the purpose of our recruitment services. It may also be processed by staff operating outside of the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, our recruitment services and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. **Skillfinder S.A.R.L.** will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL/TLS technology.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access or misuse of your personal data including a fully GDPR compliant CRM system.

Retention of your data

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate business interests and that you are happy for us to do so. Accordingly, we have a Data Retention Notice and run data routines to remove data that we no longer have a legitimate business interest in maintaining.

We do the following to try to ensure our data is accurate:

- prior to making an introduction we check that we have accurate information about you;
- we keep in touch with you so you can let us know of changes to your personal data.

We segregate our data so that we keep different types of data for different time periods. The criteria we use to determine whether we should retain your personal data includes:

- the nature of the personal data;
- its perceived accuracy;
- our legal obligations;
- whether an interview or placement has been arranged; and
- our recruitment expertise and knowledge of the industry by country, sector and job role.

We may archive part or all of your personal data or retain it on our financial systems only, deleting all or part of it from our main Customer Relationship Manager (CRM) system. We may pseudonymise parts of your data, particularly following a request for suppression or deletion of your data, to ensure that we do not re-enter your personal data on to our database, unless requested to do so.

For your information, Pseudonymised Data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms. Our current retention notice is available upon request.



Your Rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes and we will collect express consent from you if legally required prior to using your personal data for marketing purposes.

You can exercise your right to accept or prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at Data Protection Team, Skillfinder International, 6th Floor, 50 Mark Lane, EC3R 7QR or email DataProtection@Skillfindergroup.com.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

The GDPR provides you with the following rights. To:

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party in certain formats, if practicable.
- **Make a complaint** to a supervisory body which is in Luxembourg using the following contact details **Commission Nationale pour la Protection des Données** through the following link: <http://www.cnpd.lu/>

Access to information

The Data Protection Act 1998 and the GDPR give you the right to access information held about you. We also encourage you to contact us to ensure your data is accurate and complete.

Your right of access can be exercised in accordance with The General Data Protection Regulation (GDPR) from 25th May 2018.

A subject access request should be submitted to SARS@Skillfindergroup.com. No fee will apply to this request.



Changes to our Privacy Notice

Any changes we make to our Privacy Notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Privacy Notice.

Contact

Questions, comments and requests regarding this Privacy Notice are welcomed and should be addressed to DataProtection@Skillfindergroup.com .