



Trace Recruit Ltd Privacy Policy for GDPR

INTRODUCTION

This Privacy Policy explains what we do with 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, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

This Privacy Policy 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. It also applies to the emergency contacts of our Staff. To be clear, if you are a member of Trace Recruit Ltd's Staff, you should refer to the Trace Recruitment ' Staff Privacy Policy.

For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR"), the company responsible for your personal data ("Trace Recruit Ltd" or "us") can be found here.

It is important to point out that we may amend this Privacy Policy from time to time. Please just visit this page if you want to stay up to date, as we will post any changes here.

If you are dissatisfied with any aspect of our Privacy Policy, you may have legal rights and, where relevant, we have described these as well.

WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT?

CANDIDATE DATA: 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.

- a) Name;
- b) Age / Date of Birth;
- c) Sex/gender;
- d) Contact details
- e) Education details;
- f) Employment history;
- g) Referee details;
- h) Immigration status (whether you need a work permit);
- i) Nationality/citizenship/place of birth;
- j) A copy of your driving licence and/or passport/identity card;
- k) Financial information (where we need to carry out financial background checks);
- l) NI number (or equivalent in your country) and any other tax-related information;

- m) Diversity information including racial or ethnic origin, religious or other similar beliefs, and physical or mental health, including disability-related information;
- n) Details of any criminal convictions if this is required for a role that you are interested in applying for;
- o) Details about your current remuneration, pensions and benefits arrangements;
- p) 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;
- q) Extra information that you choose to tell us;
- r) Extra information that your referees chooses to tell us about you;
- s) Extra information that our Clients may tell us about you, or that we find from other third party sources such as job sites;
- t) IP address;
- u) The dates, times and frequency with which you access our services; and
- v) CCTV footage if you attend our premises

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 actually very limited. We generally only need to have your 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 Candidate profiles and other material published by Trace Recruit Ltd, which we use to ensure that our marketing communications to you are relevant and timely. We may also hold extra information that someone in your organisation has chosen to tell us. If we need any additional personal data for any reason, we will let you know.

SUPPLIER DATA: We don't collect much data about Suppliers – we simply need to make sure that our relationship runs smoothly. We'll collect the details for our contacts within your organisation, such as names, telephone numbers and email addresses. We'll also collect bank details, so that we can pay you. We may also hold extra information that someone in your organisation has chosen to tell us.

PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS: All we need from referees is confirmation of what you already know about our Candidate or prospective member of Staff, so that they can secure that job they really want. To ask for a reference, we'll obviously need the referee's contact details (such as name, email address and telephone number). We'll also need these details if a member of our Staff has put you down as their emergency contact so that we can contact you in the event of an accident or an emergency.

WEBSITE USERS We collect a limited amount of data from our Website Users which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, your browser type, the location you view our website from, the language you choose to view it in and the times that our website is most popular. If you contact us via the website, for example by using the chat function, we will collect any information that you provide to us, for example your name and contact details.

HOW DO WE COLLECT YOUR PERSONAL DATA?

CANDIDATE DATA: We collect Candidate personal data in three primary ways:

1. Personal data that you, the Candidate, give to us;
2. Personal data that we receive from other sources; and
3. Personal data that we collect automatically.

Personal data you give to us

Trace Recruit Ltd needs to know certain information about you in order to provide a tailored service. This will enable us to provide you with the best opportunities, and should save you time in not having to trawl through information about jobs and services that are not relevant to you.

There are numerous ways you can share your information with us. It all depends on what suits you. These may include:

- Entering your details on the Trace Recruit Ltd website or via an registration form, as part of the registration process;
- Leaving a hard copy CV at a Trace Recruit Ltd recruitment event, job fair or office;
- Emailing your CV to a Trace Recruit Ltd consultant or being interviewed by them;
- Applying for jobs through a jobsite or social media site such as LinkedIn or twitter, which then redirects your CV to Trace Recruit Ltd;
- Entering your personal details into a Trace Recruit Ltd website;
- Personal data we receive from other sources

We also receive personal data about Candidate from other sources. Depending on the relevant circumstances and applicable local laws and requirements, these may include personal data received in the following situations:

- Your referees may disclose personal information about you;
- Our Clients may share personal information about you with us;
- We may obtain information about you from searching for potential Candidate from third party sources, such as LinkedIn and other job sites;
- If you ask to 'join' our group on LinkedIn or 'follow' us on Twitter we will receive your personal information from those sites; and
- Personal data we collect automatically

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us

CLIENT DATA We collect Client personal data in three ways:

1. Personal data that we receive directly from you;
2. Personal data that we receive from other sources; and
3. Personal data that we collect automatically

Personal data that we receive directly from you

We both share the same goal – to make sure that you have the best staff for your organisation. We will receive data directly from you in two ways:

- Where you contact us proactively, usually by phone or email; and/or
- Where we contact you, either by phone or email, or through our consultants' business development activities more generally.

Personal data we receive from other sources:

Where appropriate and in accordance with any local laws and requirements, we may seek more information about you or your colleagues from other sources generally by way of due diligence or other market intelligence including:

- From third party market research and by analysing online and offline media (which we may do ourselves, or employ other organisations to do for us);
- From delegate lists at relevant events; and
- From other limited sources and third parties (for example from our Candidates to the extent that they provide us with your details to act as a referee for them).

Personal data we collect via our website:

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us.

WEBSITE USERS: When you visit our website there is certain information that we may automatically collect, whether or not you decide to use our services. This includes your IP address, the date and the times and frequency with which you access the website and the way you browse its content. We will also collect data from you when you contact us via the website, for example by using the chat function.

HOW DO WE USE YOUR PERSONAL DATA?

Having obtained data about you, we then use it in a number of ways.

CANDIDATE DATA: We generally use Candidate data in four ways:

- Recruitment Activities;
- Marketing Activities;
- Equal Opportunities Monitoring; and
- To help us to establish, exercise or defend legal claims
- In appropriate circumstances in the future, we may also use Candidate data for Profiling.

Here are some more details about each:

Recruitment Activities

Obviously, our main area of work is recruitment – connecting the right Candidates with the right jobs. We've listed below various ways in which we may use and process your personal data for this purpose, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive.

- a. Collecting your data from you and other sources, such as LinkedIn;
- b. Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to recruitment;
- c. Providing you with our recruitment services and to facilitate the recruitment process;
- d. Assessing data about you against vacancies which we think may be suitable for you;
- e. Sending your information to Clients, in order to apply for jobs or to assess your eligibility for jobs;
- f. Enabling you to submit your CV, apply online for jobs or to subscribe to alerts about jobs we think may be of interest to you;
- g. Carrying out our obligations arising from any contracts entered into between us;
- h. Carrying out our obligations arising from any contracts entered into between Trace Recruit Ltd and third parties in relation to your recruitment;
- i. Facilitating our payroll and invoicing processes;

- j. Verifying details you have provided, using third party resources (such as psychometric evaluations or skills tests), or to request information (such as references, qualifications and potentially any criminal convictions, to the extent that this is appropriate and in accordance with local laws);
- k. Complying with our legal obligations in connection with the detection of crime or the collection of taxes or duties; and
- l. Processing your data to enable us to send you targeted, relevant marketing materials or other communications which we think are likely to be of interest to you.

We may use your personal data for the above purposes if we deem it necessary to do so for our legitimate interests.

Marketing Activities

We may periodically send you information that we think you may find interesting, or to ask for your help with connecting other Candidates with jobs. In particular, we may wish to use your data for the purposes listed below, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive. To:

- a. enable us to develop and market other products and services;
- b. market our full range of recruitment services (permanent, temporary, contract) to you;
- c. send you details of reports, promotions, offers, networking and client events, and general information about the industry sectors which we think might be of interest to you;
- d. display promotional excerpts from your details on Trace Recruit Ltd ' website(s) as a success story (only where we have obtained your express consent to do so)

Soft opt-in consent is a specific type of consent which applies where you have previously engaged with us (for example by submitting a job application or CV, or registering a vacancy to be filled), and we are marketing other recruitment-related services. Under 'soft opt-in' consent, we will take your consent as given unless or until you opt out. For most people, this is beneficial as it allows us to suggest other jobs to you alongside the specific one you applied for, significantly increasing the likelihood of us finding you a new position. For other types of e-marketing, we are required to obtain your explicit consent.

Nobody's perfect, even though we try to be. We want to let you know that even if you have opted out from our marketing communications through our preference centre, it is possible that your details may be recaptured through public sources in an unconnected marketing campaign. We will try to make sure this doesn't happen, but if it does, we're sorry. We'd just ask that in those circumstances you opt out again.

All our marketing is based on what we think will serve our Clients and Candidates best, but we know we won't always get it right for everyone. We may use your data to show you Trace Recruit Ltd adverts and other content on other websites, for example LinkedIn.

Equal opportunities monitoring and other sensitive personal data

We are committed to ensuring that our recruitment processes are aligned with our approach to equal opportunities. Some of the data we may (in appropriate circumstances and in accordance with local law and requirements) collect about you comes under the umbrella of "diversity information". This could be information about your ethnic background, gender, disability, age, sexual orientation, religion or other similar beliefs, and/or social-economic background. Where appropriate and in accordance with local laws and requirements, we'll use this information on an anonymised basis to monitor our compliance with our equal opportunities policy. We may also disclose this (suitably anonymised where

relevant) data to Clients where this is contractually required or the Client specifically requests such information to enable them to comply with their own employment processes.

This information is what is called 'sensitive' personal information and slightly stricter data protection rules apply to it. We therefore need to obtain your explicit consent before we can use it. We'll ask for your consent by offering you an opt-in. This means that you have to explicitly and clearly tell us that you agree to us collecting and using this information.

We may collect other sensitive personal data about you, such as health-related information, religious affiliation, or details of any criminal convictions if this is appropriate in accordance with local laws and is required for a role that you are interested in applying for. We will never do this without your explicit consent.

To help us to establish, exercise or defend legal claims

In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

Profiling

Although at present all our recruitment activities involve human-decision making during the process, we may in the future use fully automated technologies such as expert systems or machine learning to complete a Candidate selection process from end-to-end, where appropriate and in accordance with any local laws and requirements.

Where appropriate, we will seek your consent to carry out some or all of these activities. If you do not provide consent to profiling, your application will continue to be reviewed manually for opportunities you apply for, but your profile will not be automatically considered for alternative roles. This is likely to decrease the likelihood of us successfully finding you a new job.

CLIENT DATA: We use Client information for:

- a. Recruitment Activities;
- b. Marketing Activities; and
- c. To help us to establish, exercise or defend legal claims.

Here are some more details about each:

Recruitment Activities

Obviously, our main area of work is recruitment, through: (i) providing you with Candidates; (ii) RPO services; and (iii) MSP programmes. We've listed below the various ways in which we use your data in order to facilitate this.

- a. Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to recruitment activities;
- b. Keeping records of our conversations and meetings, so that we can provide targeted services to you;
- c. Processing your data for the purpose of targeting appropriate marketing campaigns.

We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests. If you would like to know more about what this means, please [click here](#).

Marketing Activities

Subject to any applicable local laws and requirements, we will not, as a matter of course, seek your consent when sending marketing materials to a corporate postal or email address.

To help us to establish, exercise or defend legal claims

In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

SUPPLIER DATA: We realise that you're probably busy, and don't want us to be contacting you about all sorts of things. To find the right balance, we will only use your information:

- a. To store (and update when necessary) your details on our database, so that we can contact you in relation to our agreements;
- b. To offer services to you or to obtain support and services from you;
- c. To perform certain legal obligations;
- d. To help us to target appropriate marketing campaigns; and
- e. In more unusual circumstances, to help us to establish, exercise or defend legal claims.

We will not, as a matter of course, seek your consent when sending marketing messages to a corporate postal or email address.

PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:

We will only use the information that our Candidate gives us about you for the following purposes:

- a. If our Staff members put you down on our form as an emergency contact, we'll contact you in the case of an accident or emergency affecting them; or
- b. If you were put down by our Candidate or a prospective member of Staff as a referee, we will contact you in order to take up a reference. This is an important part of our Candidate quality assurance process, and could be the difference between the individual getting a job or not.
- c. If you were put down by our Candidate or a prospective member of Staff as a referee, we may sometimes use your details to contact you in relation to recruitment activities that we think may be of interest to you, in which case we will use your data for the same purposes for which we use the data of Clients.

If you are not happy about this, you have the right to object and can find out more about how to do so here.

WEBSITE USERS: We use your data to help us to improve your experience of using our website, for example by analysing your recent job search criteria to help us to present jobs or Candidates to you that we think you'll be interested in.

WHO DO WE SHARE YOUR PERSONAL DATA WITH?

Where appropriate and in accordance with local laws and requirements, we may share your personal data, in various ways and for various reasons, with the following categories of people:

- a. Individuals and organisations who hold information related to your reference or application to work with us, such as current, past or prospective employers, educators and examining bodies and employment and recruitment agencies;
- b. Tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this data (for example, because of a request by a tax authority or in connection with any anticipated litigation);

- c. Third party service providers who perform functions on our behalf (including external consultants, business associates and professional advisers such as lawyers, auditors and accountants, technical support functions and IT consultants carrying out testing and development work on our business technology systems);
- d. Third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place;
- e. Marketing technology platforms and suppliers;
- f. In the case of Candidates: potential employers and other recruitment agencies/organisations to increase your chances of finding employment;
- g. In the case of Candidates: third party partners, job boards and job aggregators where we consider this will improve the chances of finding you the right job;
- h. In the case of Candidates and our Candidates' and prospective members of Staff's referees: third parties who we have retained to provide services such as reference, qualification and criminal convictions checks, to the extent that these checks are appropriate and in accordance with local laws;
- i. If Trace Recruit Ltd merges with or is acquired by another business or company in the future, (or is in meaningful discussions about such a possibility) we may share your personal data with the (prospective) new owners of the business or company.

HOW DO WE SAFEGUARD YOUR PERSONAL DATA?

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures. These include measures to deal with any suspected data breach.

The personal data is held within our secure database - Influence Cloud Direct and Influence Cloud Desktop, and backups are taken which have a 30 day retention period on data.

If you suspect any misuse or loss of or unauthorised access to your personal information please let us know immediately.

HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

We will Delete your personal data from our systems if we have not had any meaningful contact with you (or, where appropriate, the company you are working for or with) for three years (or for such longer period as we believe in good faith that the law or relevant regulators require us to preserve your data). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected.

For those Candidates whose services are provided via a third party company or other entity, "meaningful contact" with you means meaningful contact with the company or entity which supplies your services. Where we are notified by such company or entity that it no longer has that relationship with you, we will retain your data for no longer than two years from that point or, if later, for the period of two years from the point we subsequently have meaningful contact directly with you.

When we refer to "meaningful contact", we mean, for example, communication between us (either verbal or written), or where you are actively engaging with our online services. If you are a Candidate we will consider there to be meaningful contact with you if you submit your updated CV onto our website or take part in any of our online training. We will also consider it meaningful contact if you communicate with us about potential roles, either by verbal or written communication or click through from any of our marketing communications. Your receipt, opening or reading of an email

or other digital message from us will not count as meaningful contact – this will only occur in cases where you click-through or reply directly.

HOW CAN YOU ACCESS, AMEND OR TAKE BACK THE PERSONAL DATA THAT YOU HAVE GIVEN TO US?

One of the GDPR's main objectives is to protect and clarify the rights of EU citizens and individuals in the EU with regards to data privacy. This means that you retain various rights in respect of your data, even once you have given it to us. These are described in more detail below.

To get in touch about these rights, please contact us. We will seek to deal with your request without undue delay, and in any event within one month (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues which you raise.

Right to object: this right enables you to object to us processing your personal data where we do so for one of the following four reasons: (i) our legitimate interests; (ii) to enable us to perform a task in the public interest or exercise official authority; (iii) to send you direct marketing materials; and (iv) for scientific, historical, research, or statistical purposes.

The "legitimate interests" and "direct marketing" categories above are the ones most likely to apply to our Website Users, Candidates, Clients and Suppliers. If your objection relates to us processing your personal data because we deem it necessary for your legitimate interests, we must act on your objection by ceasing the activity in question unless:

- a. we can show that we have compelling legitimate grounds for processing which overrides your interests;
or
- b. We are processing your data for the establishment, exercise or defence of a legal claim.

If your objection relates to direct marketing, we must act on your objection by ceasing this activity.

Right to withdraw consent: Where we have obtained your consent to process your personal data for certain activities (for example, for our marketing arrangements or automatic profiling), you may withdraw this consent at any time and we will cease to carry out the particular activity that you previously consented to unless we consider that there is an alternative reason to justify our continued processing of your data for this purpose in which case we will inform you of this condition.

Data Subject Access Requests (DSAR): You may ask us to confirm what information we hold about you at any time, and request us to modify, update or Delete such information. We may ask you to verify your identity and for more information about your request. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is "manifestly unfounded or excessive". If you request further copies of this information from us, we may charge you a reasonable administrative cost where legally permissible. Where we are legally permitted to do so, we may refuse your request. If we refuse your request we will always tell you the reasons for doing so.

Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding data subject access requests and may refuse your request in accordance with such laws. For more information in relation to your jurisdiction, please click [here](#).

Right to erasure: You have the right to request that we erase your personal data in certain circumstances. Normally, the information must meet one of the following criteria:

- a. the data are no longer necessary for the purpose for which we originally collected and/or processed them;

- b. where previously given, you have withdrawn your consent to us processing your data, and there is no other valid reason for us to continue processing;
- c. the data has been processed unlawfully (i.e. in a manner which does not comply with the GDPR);
- d. it is necessary for the data to be erased in order for us to comply with our legal obligations as a data controller; or
- e. if we process the data because we believe it necessary to do so for our legitimate interests, you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.

Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding data subject right to erasure and may refuse your request in accordance with local laws.

We would only be entitled to refuse to comply with your request for one of the following reasons:

- a. to exercise the right of freedom of expression and information;
- b. to comply with legal obligations or for the performance of a public interest task or exercise of official authority;
- c. for public health reasons in the public interest;
- d. for archival, research or statistical purposes; or
- e. to exercise or defend a legal claim.

When complying with a valid request for the erasure of data we will take all reasonably practicable steps to Delete the relevant data.

Right to restrict processing: You have the right to request that we restrict our processing of your personal data in certain circumstances. This means that we can only continue to store your data and will not be able to carry out any further processing activities with it until either: (i) one of the circumstances listed below is resolved; (ii) you consent; or (iii) further processing is necessary for either the establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of important EU or Member State public interest.

The circumstances in which you are entitled to request that we restrict the processing of your personal data are:

- a. where you dispute the accuracy of the personal data that we are processing about you. In this case, our processing of your personal data will be restricted for the period during which the accuracy of the data is verified;
- b. where you object to our processing of your personal data for our legitimate interests. Here, you can request that the data be restricted while we verify our grounds for processing your personal data;
- c. where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it; and
- d. where we have no further need to process your personal data but you require the data to establish, exercise, or defend legal claims.

If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.

Right to rectification: You also have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. Where appropriate, we will also tell you which third parties

we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.

Right of data portability: If you wish, you have the right to transfer your personal data between data controllers. In effect, this means that you are able to transfer your Trace Recruit Ltd account details to another online platform. To allow you to do so, we will provide you with your data in a commonly used machine-readable format that is password-protected so that you can transfer the data to another online platform. Alternatively, we may directly transfer the data for you. This right of data portability applies to: (i) personal data that we process automatically (i.e. without any human intervention); (ii) personal data provided by you; and (iii) personal data that we process based on your consent or in order to fulfil a contract.

Right to lodge a complaint with a supervisory authority: You also have the right to lodge a complaint with your local supervisory authority.

If you would like to exercise any of these rights, or withdraw your consent to the processing of your personal data (where consent is our legal basis for processing your personal data), details of how to contact us can be found here. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the period for which we hold your data.

If you have any comments or suggestions concerning this Privacy Policy please follow this link. We take privacy seriously so we'll get back to you as soon as possible.

OUR LEGAL BASES FOR PROCESSING YOUR DATA

LEGITIMATE INTERESTS

Article 6(1)(f) of the GDPR is the one that is relevant here – it says that we can process your data where it "is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data."

We don't think that any of the following activities prejudice individuals in any way – in fact, they help us to offer you a more tailored, efficient service, so everyone's a winner! However, you do have the right to object to us processing your personal data on this basis.

CANDIDATE DATA:

We think it's reasonable to expect that if you are looking for employment or have posted your professional CV information on a job board or professional networking site, you are happy for us to collect and otherwise use your personal data to offer or provide our recruitment services to you, share that information with prospective employers and assess your skills against our bank of vacancies. Once it's looking like you may get the job, your prospective employer may also want to double check any information you've given us (such as the results from psychometric evaluations or skills tests) or to confirm your references, qualifications and criminal record, to the extent that this is appropriate and in accordance with local laws. We need to do these things so that we can function as a profit-making business, and to help you and other Candidates get the jobs you deserve.

We want to provide you with tailored job recommendations and relevant articles to read to help you on your job hunt. We therefore think it's reasonable for us to process your data to make sure that we send you the most appropriate content.

We also think that it might help with your job search if you take part in our specialist online training or some of our more interactive services, if you have the time. These are part of our service offering as a business, and help differentiate us in a competitive marketplace, so it is in our legitimate interests to use your data for this reason.

We have to make sure our business runs smoothly, so that we can carry on providing services to Candidates like you. We therefore also need to use your data for our internal administrative activities, like payroll and invoicing where relevant.

We have our own obligations under the law, which it is a legitimate interest of ours to insist on meeting! If we believe in good faith that it is necessary, we may therefore share your data in connection with crime detection, tax collection or actual or anticipated litigation.

CLIENT DATA:

To ensure that we provide you with the best service possible, we store your personal data and/or the personal data of individual contacts at your organisation as well as keeping records of our conversations, meetings, registered jobs and placements. From time to time, we may also ask you to undertake a customer satisfaction survey. We think this is reasonable – we deem these uses of your data to be necessary for our legitimate interests as an organisation providing various recruitment services to you.

SUPPLIER DATA:

We use and store the personal data of individuals within your organisation in order to facilitate the receipt of services from you as one of our Suppliers. We also hold your financial details, so that we can pay you for your services. We deem all such activities to be necessary within the range of our legitimate interests as a recipient of your services.

PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:

If you have been put down by a Candidate or a prospective member of Staff as one of their referees, we use your personal data in order to contact you for a reference. This is a part of our quality assurance procedure and so we deem this to be necessary for our legitimate interests as an organisation offering recruitment services and employing people ourselves.

If a Candidate or Staff member has given us your details as an emergency contact, we will use these details to contact you in the case of an accident or emergency. We are sure you will agree that this is a vital element of our people-orientated organisation, and so is necessary for our legitimate interests.

CONSENT

In certain circumstances, we are required to obtain your consent to the processing of your personal data in relation to certain activities. Depending on exactly what we are doing with your information, this consent will be opt-in consent or soft opt-in consent.

Article 4(11) of the GDPR states that (opt-in) consent is "any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her." In plain language, this means that:

- a. you have to give us your consent freely, without us putting you under any type of pressure;
- b. you have to know what you are consenting to – so we'll make sure we give you enough information;
- c. you should have control over which processing activities you consent to and which you don't. We provide these finer controls within our privacy preference centre; and

- d. you need to take positive and affirmative action in giving us your consent – we're likely to provide a tick box for you to check so that this requirement is met in a clear and unambiguous fashion.

We will keep records of the consents that you have given in this way.

We have already mentioned that, in some cases, we will be able to rely on soft opt-in consent. We are allowed to market products or services to you which are related to the recruitment services we provide as long as you do not actively opt-out from these communications.

ESTABLISHING, EXERCISING OR DEFENDING LEGAL CLAIMS

Sometimes it may be necessary for us to process personal data and, where appropriate and in accordance with local laws and requirements, sensitive personal data in connection with exercising or defending legal claims. Article 9(2)(f) of the GDPR allows this where the processing "is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity".

This may arise for example where we need to take legal advice in relation to legal proceedings or are required by law to preserve or disclose certain information as part of the legal process.

ANNEX 1 – HOW TO CONTACT US

- To access, amend or take back the personal data that you have given to us;
- If you suspect any misuse or loss of or unauthorised access to your personal information;
- To withdraw your consent to the processing of your personal data (where consent is the legal basis on which we process your personal data);
- With any comments or suggestions concerning this Privacy Policy

You can write to us at the following address:

Trace Recruit Ltd, 1 Quality Court, Chancery Lane, London. WC2A 1HR

Alternatively, you can send an email to: gareth.cowan@tracerecruit.com

ANNEX 2 – HOW TO CONTACT YOUR LOCAL SUPERVISORY AUTHORITY

Country in which you use Trace Recruit Ltd ' services or supply Trace Recruit Ltd with services: UK

Details of your local supervisory authority: The Information Commissioner's Office. You can contact them in the following ways:

Phone: 0303 123 1113 / Email: casework@ico.org.uk

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow

Cheshire
SK9 5AF

GLOSSARY

Candidates – includes applicants for all roles advertised or promoted by Trace Recruit Ltd, including permanent, part-time and temporary positions and freelance roles with Trace Recruit Ltd Clients; as well as people who have supplied a speculative CV to Trace Recruit Ltd not in relation to a specific job. Individual contractors, freelance workers and employees of suppliers or other third parties put forward for roles with Trace Recruit Ltd, Clients as part of an MSP offering or otherwise will be treated as candidates for the purposes of this Privacy Policy.

Clients - while it speaks for itself, this category covers our customers, clients, and others to whom Trace Recruit Ltd provides services in the course of its business.

Delete – while we will endeavour to permanently erase your personal data once it reaches the end of its retention period or where we receive a valid request from you to do so, some of your data may still exist within our systems, for example if it is waiting to be overwritten. For our purposes, this data has been put beyond use, meaning that, while it still exists on an archive system, this cannot be readily accessed by any of our operational systems, processes or Staff.

General Data Protection Regulation (GDPR) – a European Union statutory instrument which aims to harmonise European data protection laws. It has an effective date of 25 May 2018, and any references to it should be construed accordingly to include any national legislation implementing it.

Managed Service Provider (MSP) programmes – Clients' outsourcing of the management of external staff (including freelance workers, independent contractors and temporary employees) to an external recruitment provider.

Other people whom Trace Recruit Ltd may contact – these may include Candidates' and Trace Recruit Ltd ' Staff emergency contacts and referees. We will only contact them in appropriate circumstances.

Recruitment Process Outsourcing (RPO) services – full or partial outsourcing of the recruitment process for permanent employees to a recruitment provider.

Staff – includes employees and interns engaged directly in the business of Trace Recruit Ltd (or who have accepted an offer to be engaged) as well as certain other workers engaged in the business of providing services to Trace Recruit Ltd (even though they are not classed as employees). For these purposes we also include employees Trace Recruit Ltd who are engaged to work on Clients' premises under the terms of RPO or MSP agreements. To be clear, 'Staff' does not include individuals hired by Trace Recruit Ltd for the purpose of being placed with Clients outside of an RPO/MSP arrangement. These individuals are treated in the same way as Trace Recruit Ltd Candidates and are covered by this Privacy Policy. Likewise, independent contractors and consultants performing services for Trace Recruit Ltd fall within the definition of a 'Supplier' for the purposes of this Privacy Policy.

Suppliers – refers to partnerships and companies (including sole traders), and atypical workers such as independent contractors and freelance workers, who provide services to Trace Recruit Ltd. In certain circumstances Trace Recruit Ltd will sub-contract the services it provides to Clients to third party suppliers who perform services on Trace Recruit Ltd behalf. In this context, suppliers that are individual contractors, freelance workers, or employees of suppliers will be treated as Candidates for data protection purposes. Please note that in this context, Trace Recruit Ltd requires Suppliers to communicate the relevant parts of this Privacy Policy (namely the sections directed at Candidates) to their employees.

Website Users - any individual who accesses any of the Trace Recruit Ltd websites.

