

ERS Privacy Policy (May 2018 Version)

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 or who they indicate is an emergency contact. It also applies to the emergency contacts of our Staff.

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 is "Ethos Resourcing Solution Ltd" or "us" or "ERS" or "Ethos RS".

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 data do we collect?

CANDIDATE DATA: In order to provide the best possible employment opportunities that are tailored to you, we need to process certain information about you. We only ask for details that will genuinely help us to help you, such as your name, date of birth, contact details, education details, employment history, emergency contacts, immigration status, nationality, financial information (where we need to carry out financial background checks), and national Insurance number (and of course you may choose to share other relevant information with us). Where appropriate and in accordance with local laws and requirements, we may also collect information related to your health, diversity information or details of any criminal convictions. We may also ask for a copy of your passport for ID purposes.

CLIENT DATA: If you are a customer of Ethos RS, we need to collect and use information about you, or individuals in your organisation, in the course of providing you services such as: (i) finding Candidates (ii) notifying you of content published by Ethos RS which is likely to be relevant and

useful to you. This information could include: contact names, telephone numbers and email addresses.

SUPPLIER DATA: We need a small amount of information from our Suppliers to ensure that things run smoothly. We need contact details of relevant individuals at your organisation – telephone numbers, email addresses and names - so that we can communicate with you. We also need other information such as your bank details so that we can pay for the services you provide (if this is part of the contractual arrangements between us).

To the extent that you access our website we will also collect certain data from you.

PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS: In order to provide Candidates with suitable employment opportunities safely and securely and to provide for every eventuality for them and our Staff, we need some basic background information. We only ask for very basic contact details, so that we can get in touch with you either for a reference or because you've been listed as an emergency contact for one of our Candidates or Staff members. Such information would include: name, email address and telephone number.

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, and the times that our website is most popular.

A number of elements of the personal data we collect from you are required to enable us to fulfil our contractual duties to you or to others. Where appropriate, some, for example Candidates' social security number and, religious affiliation, are required by statute or other laws. Other items may simply be needed to ensure that our relationship can run smoothly.

Depending on the type of personal data in question and the grounds on which we may be processing it, should you decline to provide us with such data, we may not be able to fulfil our contractual requirements or be able to continue with our relationship.

How do we collect your personal data?

CANDIDATE DATA: There are two main ways in which we collect your personal data:

1. Directly from you; and
2. From third parties.

To the extent that you access our website or read or click on an email from us, we may also collect certain data automatically or through you providing it to us.

Personal data you give to us:

Ethos RS 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 ERS website or via an application form, as part of the registration process;
- Leaving a hard copy CV at an ERS recruitment event, job fair or office;
- Emailing your CV to an ERS consultant or being interviewed by them;
- Applying for jobs through a job aggregator, which then redirects you to the Ethos RS website;
- Entering a competition through a social media channel such as Facebook or Twitter.

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 'like' our page on Facebook or 'follow' us on Twitter we will receive your personal information from those sites.

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: There are two main ways in which we collect your personal data:

1 Directly from you; where you contact us directly by phone, email etc. or where we contact you through our business development activities.

2 From third parties (e.g. our Candidates) and other limited sources (e.g. online and offline media).

To the extent that you access our website or read or click on an email from us, we may also collect certain data automatically or through you providing it to us.

SUPPLIER DATA: We collect your personal data during the course of our work with you.

To the extent that you access our website or read or click on an email from us, we may also collect certain data automatically or through you providing it to us.

PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS: We collect your contact details only where a Candidate or a member of our Staff puts you down as their emergency contact or where a Candidate gives them to us in order for you to serve as a referee.

WEBSITE USERS: We collect your data automatically via cookies when you visit our website, in line with cookie settings in your browser. We will also collect data from you when you contact us via the website.

How do we use your personal data?

CANDIDATE DATA: The main reason for using your personal details is for Recruitment Activities in order to help you find employment or other work roles that might be suitable for you. The more information we have about you, your skillset and your ambitions, the more bespoke we can make our service. These activities include but are not limited to:

- Collecting your data from you and other sources, such as LinkedIn;
- Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to recruitment;
- Providing you with our recruitment services and to facilitate the recruitment process;
- Assessing data about you against vacancies which we think may be suitable for you;
- Sending your information to Clients, in order to apply for jobs or to assess your eligibility for jobs;
- 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;
- Allowing you to participate in the interactive features of our services, when you choose to do so;
- Carrying out our obligations arising from any contracts entered into between us;
- Carrying out our obligations arising from any contracts entered into between Ethos RS and third parties in relation to your recruitment;

- Facilitating our payroll and invoicing processes;
- Carrying out customer satisfaction surveys;
- 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);
- Complying with our legal obligations in connection with the detection of crime or the collection of taxes or duties; and
- 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.

Where appropriate and in accordance with local laws and requirements, we may also use your personal data for things like marketing activities, profiling and diversity monitoring. Where appropriate, we will seek your consent to undertake some of these activities, which may include but are not limited to:

- enable us to develop and market other products and services;
- market our full range of recruitment services (permanent, temporary, contract, services) to you;
- 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;
- display promotional excerpts from your details on our website(s) as a success story (only where we have obtained your express consent to do so); and
- provide you with information about certain discounts and offers that you are eligible for by virtue of your relationship with Ethos RS.

We need your consent for some aspects of these activities which are not covered by our legitimate interests (in particular, the collection of data via cookies, and the delivery of direct marketing to you through digital channels) and, depending on the situation, we'll ask for this via an opt-in or soft-opt-in (which we explain further below).

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.

If you are not happy about our approach to marketing, you have the right to withdraw your consent at any time and can find out more about how to do so by contacting us on: 01622 298289. 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, you just need to opt out again.

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 data. 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

CLIENT DATA: The main reason for using information about Clients is to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly. This may involve:

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

Recruitment Activities:

Our main area of work is recruitment, through: providing you with Candidates; We've listed below the various ways in which we use your data in order to facilitate this.

- Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to recruitment activities;
- Keeping records of our conversations and meetings, so that we can provide targeted services to you;
- Undertaking customer satisfaction surveys; and
- 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 are not happy about this, in certain circumstances you have the right to object.

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 corporate postal or email address.

If you are not happy about this, you have the right to opt out of receiving marketing materials from us.

To help us to establish, exercise or defend legal claims

SUPPLIER DATA: The main reasons for using your personal data are to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly, and to comply with legal requirements, so we will only use your information:

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

We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests.

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

If you are not happy about this, in certain circumstances you have the right to object

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:

- If our Candidates or 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
- 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.
- 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 would like to find out more about what this means, please [click here](#).

We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests.

If you are not happy about this, you have the right to object.

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 to you that we think you'll be interested in. If you are also a Candidate or Client of Ethos RS, we may use data from your use of our websites to enhance other aspects of our communications with, or service to, you.

Please note that communications to and from Ethos RS' Staff including emails may be reviewed as part of internal or external investigations or litigation.

Who do we share your personal data with?

CANDIDATE DATA: We may share your personal data with various parties, in various ways and for various reasons. Primarily we will share your information with prospective employers to increase your chances of securing the job you want. Unless you specify otherwise, we may also share your information with any of our associated third parties such as our service providers where we feel this will help us to provide you with the best possible service.

CLIENT DATA: We will share your data: primarily to ensure that we provide you with a suitable pool of Candidates. Unless you specify otherwise, we may share your information with any of our group companies and associated third parties such as our service providers to help us meet these aims.

SUPPLIER DATA: Unless you specify otherwise, we may share your information with any of our associated third parties such as our service providers and organisations to whom we provide services.

PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS: Unless you specify otherwise, we may share your information with any of

our associated third parties such as our service providers and organisations to whom we provide services.

WEBSITE USERS: Unless you specify otherwise, we may share your information with providers of web analytics services, marketing automation platforms and social media services to make sure any advertising you receive is targeted to you.

Categories of people we may share your data with could include:

- 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;
- 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);
- 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);
- Third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place;
- Marketing technology platforms and suppliers;
- In the case of Candidates: potential employers and other recruitment agencies/organisations to increase your chances of finding employment;
- 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;
- 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;

How do we safeguard your personal data?

We care about protecting your information. That's why we put in place appropriate measures that are designed to prevent unauthorised access to, and misuse of, your personal data, including dealing with a suspected data breach.

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 five 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 five 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, for example. 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?

Even if we already hold your personal data, you still have various rights in relation to it. These rights include:

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:

- we can show that we have compelling legitimate grounds for processing which overrides your interests; or
- 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.

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:

- the data are no longer necessary for the purpose for which we originally collected and/or processed them;
- 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;
- the data has been processed unlawfully (i.e. in a manner which does not comply with the GDPR);
- it is necessary for the data to be erased in order for us to comply with our legal obligations as a data controller; or
- 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.

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

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

- 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;
- 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;
- where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it; and
- 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 Ethos RS 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. Details of how to contact them can be found [here](#).

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), contact us on 01622 298289 or by emailing customerservices@ethos-rs.co.uk. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

You may ask to unsubscribe from job alerts at any time.

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.

What are cookies 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.

How to reject cookies

If you don't want to receive cookies that are not strictly necessary to perform basic features of our site, you may choose to opt-out by changing your browser settings

Most web browsers will accept cookies but if you would rather we didn't collect data in this way you can choose to accept all or some, or reject cookies in your browser's privacy settings. However, rejecting all cookies means that you may not be able to take full advantage of all our website's features. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

For more information generally on cookies, including how to disable them, please refer to aboutcookies.org. You will also find details on how to delete cookies from your computer.

OUR LEGAL BASES FOR PROCESSING YOUR DATA

LEGITIMATE INTERESTS

Article 6(1)(f) of the GDPR 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. 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 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:

- you have to give us your consent freely, without us putting you under any type of pressure;
- you have to know what you are consenting to – so we'll make sure we give you enough information;
- you should have control over which processing activities you consent to and which you don't.
- you need to take positive and affirmative action in giving us your consent.

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.

As we have mentioned, you have the right to withdraw your consent to these activities. You can do so at any time, and details of how to do so can be found [here](#).

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.

How you can get in touch with 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:

Suite 3, 50 Churchill Square, Kings Hill, Kent ME19 4YU

Alternatively, you can send an email to: customerservices@ethos-rs.co.uk

How you can get in touch with us to update your marketing preferences

You can do this by contacting us on: 01622 298289

Alternatively you can email us at: customerservices@ethos-rs.co.uk

HOW TO CONTACT YOUR LOCAL SUPERVISORY AUTHORITY

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

Post: Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

GLOSSARY

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

Clients - This category covers our customers, clients, and others to who Ethos RS 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.

Other people whom Ethos RS may contact – these may include Candidates' and Ethos RS's Staff emergency contacts and referees. We will only contact them in appropriate circumstances.

Staff – includes employees and interns engaged directly in the business of Ethos RS (or who have accepted an offer to be engaged) as well as certain other workers engaged in the business of providing services to Ethos RS (even though they are not classed as employees). To be clear, 'Staff' does not include individuals hired by Ethos RS for the purpose of being placed with Clients. These individuals are treated in the same way as Ethos RS's Candidates and are covered by this Privacy Policy. Likewise, independent contractors and consultants performing services for Ethos RS 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 Ethos RS. In certain circumstances Ethos RS will sub-contract the services it provides to Clients to third party suppliers who perform services on Ethos RS's 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, Ethos RS 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 the Ethos RS website.