



TALENT INTERNATIONAL UK LTD PRIVACY NOTICE

TALENT INTERNATIONAL UK LTD ("We") are committed to protecting and respecting your privacy.

Talent International (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.

This notice: Talent International UK Ltd Privacy Statement, together with our terms of use sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Talent International UK Ltd understands that your personal information is important to you and is committed to protecting your privacy. 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 standardise data protection legislation across EU member states, increasing privacy rights for individuals and providing a rigorous framework within which commercial organisations can legally operate.

The Government intends for the GDPR to continue in UK law post Brexit and has also introduced a Data Protection Bill to replace the current Data Protection Act in due course.

Your new rights under the GDPR are set out in this notice and will only apply once the GDPR becomes law on 25th May 2018.

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

For the purposes of data protection legislation in force from time to time the data controller is TALENT INTERNATIONAL UK LTD of 138 Edmund Street, Birmingham, B3 2ES.

Who we are and what we do

We are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 (our business). We also provide the following other services, outsourcing and consultancy. We collect the personal data of the following types of people to allow us to undertake our business;

- Prospective and placed candidates for permanent, interim, temporary, contract, fixed term roles;
- Prospective, established and current client contacts;
- Suppliers that support our services;
- Consultants, Employees, temporary workers;

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



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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.talentinternational.com/uk (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, enter a competition, promotion or survey, networking events or referrals 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, or financial information, compliance documentation and references verifying your qualifications and experience and your right to work in the United Kingdom, curriculum vitae and ID, links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, Facebook or links to your professional profiles on the public domain.

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, browser plug-in types and versions, information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.

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, personal recommendations, network events, candidate interviews and legitimate conversations. 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, professional advisors and our CRM partner, Bullhorn. We may receive information about you



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from them for the purposes of our recruitment services and ancillary support services, Talent Unleashed and Talent Rise.

Purposes of the processing and the legal basis for the processing

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 goods and services we offer that are similar to those that you have already purchased, 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 temporary or permanent engagement. However, our service expands to supporting individuals and companies throughout their career, 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 is described below:

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



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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.

To maintain, expand and develop our business we need to record the personal data of prospective candidates and client contacts. We will store your data as per our [retention policy](#), and update you during this period if you wish to keep your records on file.

Why we collect your personal information:

Talent International collects personal information about you to carry out its business functions and fulfil its obligations to you, including in relation to:

- determining if you are suitable for a position;
- contacting you if a position becomes available that you may be interested in;
- submitting your details to a client for a potential position;
- notifying clients of your skills and availability for any future positions;
- complying with government legislation (e.g.: we collect your tax file number to complying with taxation and superannuation requirements);
- administration of payments to you, which may include the processing of sensitive information about you (e.g. sick leave); and
- Providing you with the opportunity to obtain benefits through direct marketing (however you will always be given the option to opt-out in relation to further direct marketing).

In addition, Talent International may occasionally be required by law to collect, use and disclose your personal information, for example in order to comply with the requirements of government departments for business data.

To deliver our ancillary services we need to;

Use and disclosure of your personal information

Your personal information may be disclosed to:

- prospective employers or entities seeking to fulfil contract and permanent positions (this may also include your rate if Talent International is operating under a preferred supplier agreement);
- staff of the departments responsible for administering the processes described above;
- Related bodies corporate and third parties for the administration and provision of selected benefits and payroll services.

References and Referrals:

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- If you have been nominated by a former colleague or candidate or a prospective member of staff as one of their referees, we use your data 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.

Your personal information may be transferred overseas, for the purposes and processes described above (for example, submitting your resume for an international position). We do send information overseas.

Who do we share your personal data with?

- **Candidate:** We may share your personal data with associated parties, in various ways and for various reasons. 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 group companies and associated third parties such as our service providers where we feel this will help us to provide you with the best possible service.
- **Client:** We will share your data: (i) to ensure that we provide you with a suitable pool of Candidates; (ii) to provide you with an Recruitment Project Programme (or assist another organisation to do so); and/or (iii) to provide you with RPO services (or assist another organisation to do so). 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:** Unless you specify otherwise, we may share your information with any of our group companies and 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.

Consent

Should we want or need to rely on consent to lawfully process 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;



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- To ensure that content from our site is presented in the most effective manner for you and for your computer.

We will use this information:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical, survey purposes and competitions;
- 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.

How to access, correct or update your personal information Talent International relies on the accuracy of the personal information you provide to us.

To the extent authorised by the Privacy Act and other applicable laws, you can access and amend your personal information held by Talent International.

If you wish to request access to, find out more about or seek amendment of your personal Information held by Talent International, you should contact the Privacy Inquiry Service (contact details below).

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.

Disclosure of your information inside and outside of the EEA

We will 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;

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- clients, business partners, suppliers, sub-contractors and related business units of Talent International Group, for the performance and compliance obligations of any contract we enter into with them or you;
- Subcontractors including email marketing specialists, event organisers, payment and other financial service providers.
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience;
- analytics and search engine providers that assist us in the improvement and optimisation of our site;
- 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 will 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 Talent International UK 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 Talent International UK Ltd Privacy Statement and other agreements; or to protect the rights, property, or safety of Talent International UK Ltd, 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

The data that we collect from you 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 the EEA who work for us or for one of our suppliers. This includes staff engaged in,



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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. We 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 technology. Where we have given you a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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.

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 policy](#) 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 will keep in touch with you so you can let us know of changes to your personal data. Talent International relies on the accuracy of the personal information you supply to us.

Talent International will take reasonable steps to ensure that we hold your personal information in a secure environment accessed only by authorised persons for approved business purposes.

However, no data transmission across the internet can be guaranteed to be 100% secure. While we strive to protect your personal information from misuse, loss and unauthorised access, we cannot guarantee the security of any information you transmit to us or receive from us across the internet. These activities are conducted at your own risk. Once we receive your transmission we make our best effort to ensure its security.

Any changes made

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;



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- 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 also exercise the right at any time by contacting us at:
complianceuk@talentinternational.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:

- 1) **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.
- 2) **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). Talent International UK Ltd cannot keep a record of individuals whose data has been erased so the individual may be contacted again by Talent International UK Ltd should we come into possession of the individuals personal data at a later date.
- 3) **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

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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.

- 4) **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.
 - 5) **Request the transfer** of your personal information to another party in certain formats, if practicable.
 - 6) **Make a complaint** to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: <https://ico.org.uk/concerns/>
- **For any of the above actions 1- 6 please email complianceuk@talentinternational.com with your request**

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.

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 Act (and the GDPR once it is in force).

A subject access request should be submitted to Compliance@talentinternational.com

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.

Talent International UK Ltd may vary this Privacy Statement and the Talent International UK Ltd Privacy Policy from time to time. The most current version of this Privacy Statement and the Talent International Privacy Policy will be published at www.talentinternational.com. We encourage you to check these documents regularly. We will not separately notify you of changes to them.



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Contact

How to 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:
- Compliance Operations Team : Talent International UK Ltd, 138 Edmund Street, Birmingham, B3 2ES

Alternatively, you can send an email to: complianceuk@talentinternational.com