

PRIVACY NOTICE FOR OUR CANDIDATES

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your working relationship with us.

This notice applies to current and former candidates, who we have either placed into a role on a permanent or temporary basis (as a non-PAYE interim) or who have contacted us/we have contacted about a prospective job role. This notice does not form part of any contract to provide services and does not apply to you if you are engaged by us as a PAYE interim.

This privacy notice does not apply to you in your capacity of a client of ours. The notice that applies to our clients can be accessed here <http://cyberteam.co.uk/gdpr/>

References to we, our or us in this privacy notice are to Mint Resourcing Corporation (Ireland) Limited a limited company incorporated in Ireland. Registered Number: 620117 Registered Office: Unit 3D North Point House, North Point Business Park, New Mallow Road, Cork, Ireland .

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we not required to do so, but our Data Protection Compliance Team has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "**Contacting us**" section at the end of this privacy notice.

For the purposes of data protection we will be the controller of any of your personal information.

1. PERSONAL INFORMATION

In order to support your career aspirations and source new job opportunities for you, you may provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details such as name, title, addresses, telephone numbers and personal email addresses and Skype account contact details;
- date of birth;
- gender;
- identification documents (including passport/driving licence details (including copies where we are required to hold such information for identification purposes);
- employment history and location of current workplace, salary, annual leave, pensions and benefits entitlement;
- location of employment or workplace;
- attendance at any events we host or organise;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- recruitment records including references and other information included in a CV, cover letter or as part of the application process) and activities (including information about interviews, jobs applications and offers);
- details about how you use our website e.g. the pages you look at and how you use them, usernames and passwords;
- images in photographic or video format (where we record any footage of a video-conference between you and a client); and
- referee details, next of kin, beneficiaries, details of family members and emergency contacts.

Where you are engaged by us as a non-PAYE interim, and we provide your services to our clients on a contract/service basis, then additionally we may hold the following additional information:

- financial details such as bank accounts and details of payment transactions with you;
- national insurance number and other tax or governmental identifiers;;and
- work records (including timesheets, working hours, details of any new position, start date, leaving date and salary/remuneration).

2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We do not generally collect, store and use the following “**special categories**” of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- information about your trade union memberships;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information; and
- biometric information about you, for example fingerprints, retina scans.

If we do collect any special category personal information, we do not currently rely on consent as a basis for processing special category personal information.

We will also not collect, store and use any criminal records information in relation to you. If we do collect any criminal records information, we do not currently rely on consent as a basis for processing criminal records information.

3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about candidates when you fill in forms online or upload a CV onto our site at www.cyberteam.co.uk or when you correspond with us by phone, e-mail or otherwise.

We also may collect personal information about candidates through other sources such as LinkedIn, job board websites, online CV libraries, personnel recommendations and referrals, hiring platforms and through the use of business development tools.

Where you are an interim worker we may collect additional information from third parties including the client you are working for and any background check agencies.

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that information. Please refer them to our "Rest of the World" privacy notice which can be found here <http://cyberteam.co.uk/gdpr/>. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

4. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis
Non- ‘special categories’ of Personal Information		
To assess your CV and qualifications (<i>where you have provided us with/we have collected your personal information directly from you</i>)	All the personal information we collect for the purposes of the recruitment process.	We need this information to be able to perform and administer the recruitment process for you.
To provide you with information regarding job opportunities that may be of interest to you based on your CV and qualifications (<i>where</i>	All the personal information we collect for the purposes of the recruitment process.	As above.

<i>you have provided us with/we have collected your personal information directly from you)</i>		
To contact you with information regarding job opportunities that may be of interest to you based on your CV and qualifications (<i>where we have obtained your information from a third party source</i>)	All contact details and all information contained in any CV (including employment and education history and location of current workplace).	Where your personal information has been sourced indirectly from either: (i) a hiring platform; (ii) social media platform where you have selected a function to let recruiters know that you are open to job opportunities; or (iii) a job board onto which you have uploaded your CV we have a legitimate business interest to do so. In all other cases, we will only contact you with information about job opportunities where we have your consent to do.
To manage our relationship with you including dealing with any support enquiries made by you	All the personal information we collect for the purposes of the recruitment process.	To be able to manage and perform our contract with you and it is also in our legitimate business interest to ensure that all enquiries are managed properly.
To share your CV or details of your qualifications with a client in relation to potential job roles	All the personal information we collect for the purposes of the recruitment process.	We have a legitimate business interest to do so.
To arrange an interview with/introduction to a prospective employer in relation to a particular job role and managing the introductory process, provided you have indicated that you are happy for an introduction to be arranged	All the personal information we collect for the purposes of the recruitment process.	We will only do so with your explicit consent.
To check you are legally entitled to work in the UK	Personal contact details and identification documents and right to work documentation	We have a legal obligation to do so and it is also in our legitimate business interest to ensure that you are suitable for a role.
Storage of records relating to you and also records relating to our business such as your recruitment records and records of your interactions	All the personal information we collect for the purposes of the recruitment process.	To be able to manage and fulfil our contract with you, we may have a legal obligation to do so and we also have a legitimate

with us		interest to keep proper records.
Dealing with legal disputes involving you.	All the personal information we collect for the purposes of the recruitment process.	We have a legitimate interest to ensure that all legal claims are managed effectively.
To send you information we think you might find useful or which you have requested from us, including information about our services and any events we are running, provided you have indicated that you are happy to be contacted for these purposes	Personal contact details	We may ask for your consent to process your data for this purpose, you may revoke your consent at any point. Alternatively, if you have previously engaged with us (for example by submitting a job application or CV to us) or requested this information from us previously, we may market these other recruitment related activities to you as a legitimate interest in developing our business. You have the right to opt out from such marketing at any time.
To conduct data analytics studies to review and better understand market trends within the recruitment industry	Records of your attendance at any events hosted by us. All the personal information we collect for the purposes of the recruitment process.	We have a legitimate interest in doing so to ensure that our business is targeted and relevant.
Complying with health and safety obligations	Personal identifiers	We have a legal obligation to comply with Health and Safety laws.
For the purpose of complying with any legal or regulatory requirements	All the personal information we collect about you.	We may have a legal obligation to comply with certain requirements and we have a legitimate interest in complying with any regulatory requirements

Interim Workers

Where you are engaged by us as a non-PAYE interim, then additionally we may also use your information as follows:

<i>Purpose</i>	<i>Personal information used</i>	<i>Lawful basis</i>
Making a decision about your appointment with our client and managing the process	All the personal information we collect for the purposes of the recruitment process	We need this information to be able to perform and administer the recruitment process for you to engage you This is necessary to enter into a

		contract with you
To administer the contract we have entered into with you and to facilitate our payroll and invoicing processes	<p>Personal identifiers and all the personal information we collect for the purposes of the recruitment process.</p> <p>Working records.</p> <p>All payment and transaction details.</p>	We need this information to be able to perform and administer our contract with you.
Assessing qualifications for a particular role or job.	All the personal information we collect for the purposes of the recruitment process	<p>We may be legally obliged to do so</p> <p>To be able to manage and perform our contract with you</p> <p>We have a legitimate interest to run and manage our business and to ensure that our interims are suitable for the roles we place them into.</p>

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to engage you or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your engagement. For other personal information, whilst you may not be under an obligation to provide it to us, if you do not provide it then we may not be able to properly perform our contract with you.

You should be aware that you are not required under any contract with us to agree to any request for consent. Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "**Contacting us**" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain services to you.

5. DIRECT MARKETING

Email, post and SMS marketing: from time to time, we may contact you by email, post or SMS with information about products and services we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by emailing us at gdpr@cyberteam.co.uk . You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

6. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- **Any party approved by you.**
- **Clients of our business where necessary:** For example, (where you are a contractor) the client of ours for whom you are ultimately providing services to.
- **Other service providers to our business and advisors:** for example payroll, email marketing specialists, business development tool providers, professional advisors, contractors, and administration and IT services (including CRM, website, video- and

teleconference services). All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information.

- **Purchasers of our business:** buyers or perspective buyers to whom we sell or negotiate to sell our business.
- **Prospective new employers:** our clients for the purpose of introducing you as a prospective new candidate;
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives, for example HMRC or the Information Commissioner's Office; and
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

We do not disclose personal information to anyone else except as set out above.

7. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect about you is not transferred to or stored in countries outside of the UK or European Union except as set out in this section.

In limited circumstances the people to whom we may disclose personal information as mentioned in the "**Who we share your personal information with**" section above may be located outside of the UK and European Union. In these cases we will impose any legally required protections to the personal information as required by law before it is disclosed.

If you require more details on the arrangements for any of the above then please contact us using the details in the "**Contacting us**" section below.

8. HOW LONG WE KEEP PERSONAL INFORMATION FOR

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of 6 years following your last contact with us.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you move home or change your phone number or email address. You can contact us by using the details set out in the "**Contacting us**" section below.

9. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and

- the right to object to certain automated decision making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example we do not use automated decision making in relation to your personal data. However some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

10. CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

11. CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please email gdp@cyberteam.co.uk or write to us at GDPR Compliance Team, Unit 3D North Point House, North Point Business Park, New Mallow Road, Cork, Ireland.

Version 5th October 2018