

PRIVACY NOTICE

Cititec Associates Limited ("We") are committed to protecting and respecting your privacy.

This notice, together with our Data Protection Policy, sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Both documents can be found at <https://www.cititec.com/data-protection>.

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

The GDPR will be applicable in the UK from 25th May 2018. 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 but will only apply once the GDPR becomes law on 25th May 2018.

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

Our Data Protection Officer is Ben Iddon.

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 collect the personal data of the following types of people to allow us to undertake our business;

- Prospective and placed candidates for permanent or temporary roles;
- Prospective and live client contacts;
- Supplier contacts to support our services; and
- Employees, consultants, temporary workers.

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

Information you give to us or we collect about you.

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

The information you give us or we collect about you will depend on your relationship with us and the progression of service(s) we provide to you. This may include your name, address, private and corporate e-mail address and phone number, curriculum vitae and photograph, financial information, compliance documentation and references verifying your qualifications and experience and your right to work in the United Kingdom, links to your

professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website.

Information we collect about you when you visit our website.

With regard to each of your visits to our site we will automatically collect your IP address. This allows us to monitor usage of the website. An IP address is also captured if a CV is uploaded.

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, public social media profiles. 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 business partners, sub-contractors in technical, professional, payment and other services, advertising networks, analytics providers, search information providers, credit reference agencies, and professional advisors. We may receive information about you from them for the purposes of our recruitment services and ancillary support services.

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 and services that you request from us or we think will be of interest to you because it is relevant to your career or to your organisation.
- To provide you with information about other services we offer that are similar to those that you have already 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 throughout their career and to supporting businesses' resourcing needs and strategies.

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

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

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

We will in some circumstances rely on consent for particular uses of your data and you will be asked for your express consent, if legally required. Examples of when consent may be the

lawful basis for processing include permission to introduce you to a client (if you are a candidate).

Our Legitimate Business Interests

Our legitimate interests in collecting and retaining your personal data 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.

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.

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.

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:

Selected third parties including:

- clients for the purpose of introducing candidates to them;
- candidates for the purpose of arranging interviews and engagements;
- clients, business partners, suppliers and sub-contractors for the performance and compliance obligations of any contract we enter into with them or you

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 Cititec Associates Limited 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 to protect the rights, property, or safety of Cititec Associates Limited, 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

All data is processed within the EEA however for resiliency purposes backups of some data is encrypted and transferred to a trusted site in The U.S.A who are members of the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework. They also adhere to an enhanced version of the Privacy Shield called BBB EU PRIVACY SHIELD that allows for advanced conflict resolution.

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 which is available on request.

Your rights

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

You can exercise the right at any time by contacting us at dpo@cititec.com

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

The GDPR provides you with the following rights. To:

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party in certain formats, if practicable.
- **Make a complaint** to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: <https://ico.org.uk/concerns/>

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.

A subject access request should be submitted to dpo@cititec.com

Changes to our privacy notice

Any changes we make to our privacy notice in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy notice.

Contact

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to dpo@cititec.com