

PRIVACY NOTICE

Version 3 (October 2022)

Cititec is committed to protecting and respecting your privacy. Please read this Privacy Notice (“**notice**”) carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

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/>.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation and Data Protection Act 2018 (DPA 2018) (“**UK GDPR**”). We are also subject to the EU General Data Protection Regulation (“**EU GDPR**”) in relation to services we offer in the European Economic Area (**EEA**).

Our Data Protection Officer is Ben Iddon who can be contacted using the details in the ‘**How to contact us**’ section below.

Who we are and what we do

We are Cititec Talent Limited.

Cititec is a UK company registered under Company Number 03614377 and has its registered office at First Floor, 5 Fleet Place, London, EC4M 7RD.

We are also based in South Africa, registered at Cititec, The Vineyards Office Estate, Farm 1, Building A, 99 Jip de Jager, De Bron, Bellville, Cape Town, South Africa.

When we refer to “**we**” in this notice, we mean all of our Cititec entities as described above, which for the purposes of the UK and EU GDPR act as joint-controllers of your personal data .

We are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 (our **Business**). As part of our Business, we offer the provision of recruitment and contracting services (our **Services**). In order to provide these Services, 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 website accessible at: 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 mailing lists or 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. You will be asked to provide us with information

about your identity - such as your name, address, email address, home and work telephone numbers, curriculum vitae and details of your qualifications, experience and employment history and interests, photograph and financial information - as well as information about your nationality and background and other documents such as your passport, work permit/visa and driving licence when this is applicable and/or required to meet regulatory and compliance requirements of Cititec our clients. This will enable us to proceed with verifying your qualifications and experience and your right to work in the United Kingdom.

Sensitive data and background checks/verifications.

Certain personal data we collect is treated as a special category to which additional protections apply under data protection law. Examples of sensitive data include: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, as well as data concerning health, sex life or sexual orientation.

This sensitive data may be collected if our clients require evidence of nationality for visa or work permit requirements or if you need assistance or adjustments to attend an interview.

Where we process such special category personal data, we will also ensure we are permitted to do so under data protection laws.

Please note that we do not intentionally and directly process sensitive data unless you voluntarily choose to provide this to us or where you agree to provide it following a request from us, our clients, or our third-party suppliers. With respect to sensitive data (which may include background checks, including CRB checks and credit checks), we will only collect and process such data if you consent to provide it to us. Please note that we may use third parties to assist us in carrying out such verifications and your data will only be shared with them on the basis of your consent, which you may withdraw at any time following the process set out in this notice.

Information we collect about you when you visit our Site.

With regard to each of your visits to our Site, subject to our compliance with cookies rules and your consent (where this is legally required) we will collect your IP address. This allows us to monitor usage of the Site. An IP address is also captured if a CV is uploaded via our Site.

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, as soon as reasonably possible (and at the latest at the first time we contact you) regarding 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. Such information will always be processed in accordance with this notice.

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 Services 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 Services expand 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) or to collect and process sensitive data as set out above.

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. Withdrawal of consent will not affect the lawfulness of any processing we carried out up until your consent was withdrawn. Where we rely on consent as a basis for processing your personal data, we will not also rely on another lawful basis since we consider this would be unfair, and the ICO (the UK regulator) also shares this view.

Cookies

A cookie is a small text file which is placed onto your device (eg computer, smartphone or other electronic device) when you use our Site.

Our Site uses cookies to distinguish you from other users of our Site. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our Site. Unless the cookies are strictly necessary for the proper functioning of the Site or to enable us to provide a Service to you, we will always ask for your prior consent before applying cookies or other similar technologies. You can manage your consent options via the consent tool available on our Site.

Marketing

We will use your personal data to send you updates either by phone, e-mail or otherwise about our Services, including exclusive offers, promotions or new Services.

You have the right to opt out of receiving marketing communications at any time by:

- contacting us using the details below; or
- using the 'unsubscribe' link in emails you receive.

We will always treat your personal data with the utmost respect and never sell or share it with other organisations outside of Cititec's group for marketing purposes.

Keeping your personal data secure

We have appropriate security measures to prevent your personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine need to access it.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your personal data and other information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

Disclosure of your information inside and outside of the UK and the EEA

We may pass any data collected or generated to other Cititec Group companies, including outside the UK and EEA, and to suppliers of Cititec which may be located outside the UK and 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 Talent 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 Talent 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.

We only allow those organisations to handle your personal data if we are satisfied they take appropriate measures to protect your personal data.

Where we store and process your personal data

Concerning the transfer of your personal data out of the UK and EEA:

The EEA, UK and other countries outside the EEA and the UK have differing data protection laws, some of which may provide lower levels of protection of privacy.

It might become necessary for us to transfer your personal data to countries outside the UK and EEA (such as when our Cititec entity is based outside of those regions). In those cases we will comply with applicable UK and EEA laws designed to ensure the privacy of your personal data.

In the event we do transfer data outside of the UK or EEA, under data protection laws, we will only transfer your personal data to a country outside the UK and the EEA where:

- in the case of transfers subject to UK data protection law, the UK Government has decided the particular country ensures an adequate level of protection of personal data (known as an **'adequacy regulation'**) further to Article 45 of the UK GDPR.
- in the case of transfers subject to EEA data protection laws, the European Commission has decided that the particular country ensures an adequate level of protection of personal data (known as an **'adequacy decision'**) further to Article 45 of the EU GDPR.
- there are appropriate contractual safeguards in place, together with enforceable rights and effective legal remedies for you (for example using Standard Contractual Clauses or the UK Addendum; or
- a specific exception applies under relevant data protection law.

Any changes to the destinations to which we send personal data or in the transfer mechanisms we rely on to transfer personal data internationally will be notified to you in accordance with the section on **'Changes to our Privacy Notice'** below.

Retention of your data

We will not keep your personal data for longer than we need it for the purpose for which it is collected as set out in this notice.

Different retention periods apply for different types of personal data. Further details on this are available in our Data Retention Policy, which is available on request.

Following the end of the of the relevant retention period, we will delete or anonymise your personal data.

Your rights

You generally have the following rights, which you can usually exercise free of charge:

Access to a copy of your personal data	The right to be provided with a copy of your personal data A more detailed explanation of this right under UK law is available here: Right of access ICO
Correction (also known as rectification)	The right to require us to correct any mistakes in your personal data A more detailed explanation of this right under UK law is available here: Right to rectification ICO
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data in certain situations

	<p>A more detailed explanation of this right under UK law is available here: Right to erasure ICO</p>
Restriction of use	<p>The right to require us to restrict use of your personal data in certain circumstances, eg if you contest the accuracy of the data</p> <p>A more detailed explanation of this right under UK law is available here: Right to restrict processing ICO</p>
Data portability	<p>The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations</p> <p>A more detailed explanation of this right under UK law is available here: Right to data portability ICO</p>
To object to use	<p>The right to object:</p> <ul style="list-style-type: none"> —at any time to your personal data being used for direct marketing (including profiling) —in certain other situations to our continued use of your personal data, eg where we use your personal data for our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims <p>A more detailed explanation of this right under UK law is available here: Right to object ICO</p>
Not to be subject to decisions without human involvement	<p>The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you</p> <p>We do not make any such decisions based on data collected by our Site</p> <p>A more detailed explanation of this right under UK law is available here: Rights related to</p>

	automated decision making including profiling ICO
The right to withdraw consents	<p>If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time</p> <p>You may withdraw consents by contacting us. In respect of cookies, you can manage consent by using the cookies manager tool on our Site.</p> <p>Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn</p>

For further information on each of those rights, including the circumstances in which they do and do not apply, please contact us (see '**How to contact us**' below). You may also find it helpful to refer to the [guidance from the UK's Information Commissioner](#) on your rights under the UK GDPR.

If you would like to exercise any of those rights, a request should be submitted to dpo@cititec.com

Changes to our Privacy Notice

This notice was published on 25th May 2018 and last updated on 6th October 2022. We may change this notice from time to time. Any changes we make to our notice in the future will be posted on this page. Please check back frequently to see any updates or changes to our notice.

How to contact us

Questions, comments and requests regarding this notice are welcomed and should be addressed to dpo@cititec.com. If you have any queries or concerns about our use of your personal data, we hope we will be able to resolve any issues you may have in the first instance.

However, if we are unable to resolve matters to your satisfaction then you also have the right to lodge a complaint with the Information Commissioner in the UK.

The UK's Information Commissioner may be contacted using the details at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

If you live in the EEA, you also have the right to have recourse to a competent data protection supervisory authority in the EEA State of your habitual residence, place of work or alleged breach of data protection laws in the EEA.

For a list of EEA data protection supervisory authorities and their contact details see [here: Our Members | European Data Protection Board \(europa.eu\)](#).