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Privacy Policy

(A) This Policy

This Policy is provided by Vantis Resourcing (“Vantis Resourcing”, “we” or “us”), and is addressed to individuals outside our organisation with whom we interact, including (but not limited to) Clients, Candidates, Participants, Sources and visitors to our websites (together, “you”). Defined terms used in this Policy are explained further in Section (O) below.

For the purposes of this Policy, Vantis Resourcing is the Controller. Contact details are provided in Section (M) below.

Please note that this Policy does not apply to the Processing by Vantis Resourcing of the Personal Information of Vantis Resourcing employees or other staff in connection with the roles they perform for Vantis Resourcing. A separate privacy internal policy governs such Processing.

This Policy may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Information, or changes in applicable law. We encourage you to read this Policy carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this Policy. We will notify you of any significant changes.

(B) Processing your Personal Information

Collection of Personal Information: We may collect Personal Information about you, such as your name, address and contact details. Examples of sources from which we may collect Personal Information include the following:

- We may obtain your Personal Information when you provide it to us (e.g., where you contact us via email or telephone, or by any other means).
- We may collect your Personal Information in the ordinary course of our relationship with you (e.g., if we offer to connect you with our Clients we may collect your Personal Information that are related to such Client opportunities, such as your résumé).
- We may collect Personal Information that you manifestly choose to make public, including via social media (e.g., we may collect information from your social media profile(s), to the extent that you choose to make your profile publicly visible).
- We may receive your Personal Information from third parties who provide it to us (e.g., past employers; referees; and law enforcement agencies).
- We may, with your prior express written consent, conduct background checks, in accordance with the protections provided by applicable law.
- We may collect or obtain Personal Information when you visit any Vantis Resourcing website (the “Site”) or use any features or resources available on or through a Site. When you visit a Site, your device and browser will automatically disclose certain information (such as device type, operating system, browser type, browser settings,

IP address, language settings, dates and times of connecting to a Site and other technical communications information), some of which may constitute Personal Information.

Creation of Personal Information: We may also create Personal Information about you, such as records of any interviews you attend. We collect, process and store information when you send, receive, or engage with messages in connection with our Services. This includes information such as the number of messages you've sent and received, details of who you've chatted with and when and which messages were responded to ("Message Data"). This Personal Information helps us to conduct our operations and manage our workforce.

We also may use automatic scanning technology on messages to allow us to recognize patterns on our messaging platform. These patterns may help us make your professional communications more efficient and informed and contribute to a safer and more secure job search experience. For example, our software may do the following:

- Look for text that indicates a web link (e.g. ends with ".com" or similar) to generate a clickable link
- Provide auto-complete options when it anticipates who the receiver of the message may be
- Look for content to provide *quick actions* such as a scheduling tool
- Look for content to provide *quick replies* based on context
- Check links shared in messages for malicious sites and looks for blacklisted keywords to detect spam and fraud.

Automated Decision-Making and Profiling : In the event that we use personal data for the purposes of automated decision-making and those decisions have a legal (or similarly significant effect) on you, you have the right to challenge to such decisions under GDPR, requesting human intervention, expressing your own point of view, and obtaining an explanation of the decision from Us.

The right described above does not apply in the following circumstances:

- The decision is necessary for the entry into, or performance of, a contract between you and us;
- The decision is authorised by law; or
- You have given your explicit consent.

Where We use your personal data for profiling purposes, the following shall apply:

- Clear information explaining the profiling will be provided, including its significance and the likely consequences;
- Appropriate mathematical or statistical procedures will be used;
- Technical and organisational measures necessary to minimise the risk of errors and to enable such errors to be easily corrected shall be implemented; and
- All personal data processed for profiling purposes shall be secured in order to prevent discriminatory effects arising out of profiling.

Personal Information you provide about others: In some circumstances, you may provide us with Personal Information about others. For example, you might act as a Source and provide comments on a Candidate or Participant. Whenever you provide any such Personal Information, we rely on you to ensure that you have a lawful basis for providing such

Personal Information to us, and that you have complied with applicable law and with the terms of this Policy. If you are unable to do so, please refrain from providing the Personal Information of third parties to us.

Relevant Personal Information: The categories of Personal Information about you that we may Process include:

- Personal details: given name(s); preferred name; gender; date of birth / age; nationality; photograph; marital status; job title; employer entity; department; salary and compensation details; passport number (where applicable); visa number (where applicable); and work authorisation number (where applicable).
- Contact details: home address; work address; home telephone number; work telephone number; work mobile number; personal mobile telephone number; personal email address; work email address; and social media profile details.
- Employment records: dates and details of current and former positions held; details of current and former employers; dates of employment; job titles; job locations; subject matter experience; and details of any employment disciplinary issues or incidents.
- Details of referees: details of referees you may provide, including the relationship that you may have with each such referee, and the duration for which you have known each such referee.
- Background checks: details revealed by background checks conducted in accordance with applicable law and subject to your prior express written consent, including details of past employments, details of residence, credit reference information, and criminal records checks.
- Views and opinions: your views on Candidates or Participants, where applicable.

Lawful basis for Processing Personal Information: In Processing your Personal Information in connection with the purposes set out in this Policy, we may rely on one or more of the following legal bases:

- we have obtained your prior express consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way);
- the Processing is necessary in connection with any contract that you may enter into with us;
- the Processing is required by applicable law;
- the Processing is necessary to protect the vital interests of any individual; or
- we have a legitimate interest in carrying out the Processing, which is not overridden by your interests, fundamental rights, or freedoms. Where we rely on this legal basis, our legitimate interests are:
 - our legitimate interest in the management and operation of our business;
 - our legitimate interest in the promotion of our business; and
 - our legitimate interest in the provision of services to our Clients.

Processing your Sensitive Personal Information: We do not seek to collect or otherwise Process your Sensitive Personal Information, except where:

- the Processing is required or permitted by applicable law (e.g., to comply with diversity reporting obligations);
- the Processing is necessary for the detection or prevention of crime;
- the Processing is necessary for the establishment, exercise or defence of legal rights; or
- we have, in accordance with applicable law, obtained your prior explicit consent before Processing your Sensitive Personal Information (as above, this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Purposes for which we may Process your Personal Information: The purposes for which we may Process Personal Information, subject to applicable law, include:

- Recruitment activities on behalf of Clients: recruitment operations; advertising Client opportunities; providing services to our Clients; enabling Clients to understand which Candidates are interested in their opportunities; record-keeping; and performing background checks.
- Provision of services to you: providing our Sites and other services to you; attending meetings with you; attending telephone calls with you; and otherwise communicating with you in relation to those services.
- Our Sites: operating and managing our Site; providing content to you; displaying advertising and other information to you; and communicating and interacting with you via our Site.
- Training: providing you with training and preparation for interviews.
- Newsletters and other marketing communications: communicating with you via any means (including via email, telephone, text message, social media, post or in person) news items and possible opportunities in which you may be interested.
- Communications and IT operations: management of our communications systems; operation of IT security; and IT security audits.
- Health and safety: health and safety assessments and record keeping; and compliance with related legal obligations.
- Financial management: sales; finance; corporate audit; and vendor management.
- Surveys: engaging with you for the purposes of obtaining your views on relevant issues and topics.
- Improving our services: identifying issues with existing services; planning improvements to existing services; creating new services.

(C) Disclosure of Personal Information to third parties

We may disclose your Personal Information to:

- legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;
- our Clients, for the purposes of providing services to those Clients, in accordance with the provisions of this Policy;

- accountants, auditors, lawyers and other outside professional advisors, subject to binding contractual obligations of confidentiality;
- third party Processors (such as providers of background checking services), located anywhere in the world, subject to the requirements noted below in this Section (C);
- any relevant party, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights;
- any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security;
- any relevant third-party acquirer(s), in the event that we sell or transfer all or any portion of our business or assets (including in the event of a reorganization, dissolution or liquidation); and
- our Site may use third party plugins or content (e.g., Facebook, Twitter, Google+ and LinkedIn). If you choose to interact with any such plugins or content, your Personal Information may be shared with the relevant third party.

If we engage a third-party Processor to Process your Personal Information, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Information in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Information (iii) the contractual obligations are approved by the ICO (UK Data Processing Authority).

(D) International transfer of Personal Information

Countries outside of the European Economic Area (**EEA**) do not always offer the same levels of protection to your Personal Information, so European law has prohibited transfers of Personal Information outside of the EEA unless the transfer meets certain criteria.

Whenever we transfer your Personal Information out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is implemented:

We will only transfer your Personal Information to countries that have been deemed to provide an adequate level of protection for Personal Information by the European Commission; or

Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give Personal Information the same protection it has in Europe; or

Where we share information with clients based in the United States, we may transfer data to them if they are part of the EU-US Privacy Shield which requires them to provide similar protection to Personal Information shared between the Europe and the US.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer.

Please email us at info@vantisresourcing.com if you want further information on the specific mechanism used by us when transferring your Personal Information out of the EEA.

(E) Data Security

We have implemented appropriate technical and organisational security measures designed to protect your Personal Information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law.

You are responsible for ensuring that any Personal Information that you send to us is sent securely.

(F) Data Accuracy

Your Personal Information that we Process will be kept accurate and, where necessary, kept up to date. We take every reasonable step to ensure that:

- your Personal Information that we Process are accurate and, where necessary, kept up to date; and
- any of your Personal Information that we Process that are inaccurate (having regard to the purposes for which they are Processed) are erased or rectified without delay.

From time to time we may ask you to confirm the accuracy of your Personal Information.

(G) Data Minimisation

We take every reasonable step to ensure that your Personal Information that we Process are limited to the Personal Information reasonably required in connection with the purposes set out in this Policy.

(H) Data Retention

We will keep copies of your Personal Information in a form that permits identification only for as long as is necessary in connection with the purposes set out in this Policy unless applicable law permits or requires a longer retention period.

Should you wish to withdraw that permission, you may do so using the contact details provided in Section (M) below.

(I) Your legal rights

Subject to applicable law, you may have a number of rights regarding the Processing of your Personal Information, including:

- the right to request access to, or copies of, your Personal Information that we Process or control;
- the right to request rectification of any inaccuracies in your Personal Information;
- the right to request erasure of your Personal Information that we Process or control;

- the right to request restriction of Processing of your Personal Information that we Process or control;
- the right to object to the Processing of your Personal Information;
- the right to have your Personal Information transferred to another Controller, to the extent applicable;
- where we Process your Personal Information on the basis of your consent, the right to withdraw that consent; and
- the right to lodge complaints regarding the Processing of your Personal Information with a Data Protection Authority.

To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Policy, or about our Processing of your Personal Information, please use the contact details provided in Section (M) below.

(J) Cookies

We use Google Analytics to count visitors to our website. We also use a vantisresourcing cookie to manage performance of the site. We do not create visitor profiles by any means. See Cookie Policy for more information.

(K) Terms of Use

All use of our Site is subject to our Legal Disclaimer at the end of this Policy.

(L) Your obligations

If, and to the extent that, you are a Candidate or Participant, we rely on you to provide us with complete and accurate Personal Information about you, so that we can provide appropriate services to you and to our Clients.

If, and to the extent that, you are a Source, we rely on you to ensure that you are lawfully able to disclose Personal Information to us, as set out in this Policy.

(M) Contact details

If you have any comments, questions or concerns about any of the information in this Policy, or any other issues relating to the Processing of Personal Information by Vantis Resourcing, please contact either Sarah Marsden by writing to info@vantisresourcing.com

If you wish to contact the ICO you can call them on 0303 123 1113 or the support page on <https://ico.org.uk/global/contact-us/>. Vantis Resourcing has the ICO registration number ZA169799

(N) Children's Privacy

Vantis Resourcing does not knowingly collect or solicit Personal Information from anyone under the age of 13 or knowingly allow such persons to register to use the Services. No one under age 13 is allowed to provide any Personal Information to Vantis Resourcing or on the Site. In the event that we learn that we have collected Personal Information from a child under age 13, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 13, please contact us at info@vantisresourcing.com

(O) Definitions

‘Candidate’ means a candidate, or potential candidate, for a position with a Client.

‘Client’ means a client of Vantis Resourcing.

‘Controller’ means the entity that decides how and why Personal Information is Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.

‘Data Protection Authority’ means an independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.

‘Personal Information’ means information that is about any individual, or from which any individual is identifiable. Examples of Personal Information that we may Process are provided in Section (B) above.

‘Personnel’ means any current, former or prospective employee, consultant, temporary worker, intern, other non-permanent employee, contractor, secondee or other personnel.

‘Process’, ‘Processing’ or ‘Processed’ means anything that is done with any Personal Information, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

‘Processor’ means any person or entity that Processes Personal Information on behalf of the Controller (other than employees of the Controller).

‘Sensitive Personal Information’ means Personal Information about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that may be deemed to be sensitive under applicable law.

‘Source’ means any person that provides any view or opinion regarding the qualities of any Candidate or Participant, for any purpose, including but not limited to the suitability of a Candidate or Participant for a particular role.

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