

Apeiro Ltd Candidate Privacy Agreement

Introduction

At Apeiro Ltd, we use certain elements of your personal data to contact you with regard to both permanent and/or contract job opportunities. In this Candidate Privacy Agreement, we have described how we collect, what we collect, what we store, who we share your personal data with, how we use your personal data, how you can update it and how long we keep your data. We take every care to protect your personal data and your privacy during this process in accordance with all relevant legislation. There are steps you can take to control what we do with your personal data and these are explained in this agreement.

By Personal Data, we mean data, which could be used to identify you, including your name and contact details and any related data, if we progress a job application for you, which could be attributed to you. Apeiro Ltd is responsible for this data.

We will never sell or rent your data to someone else.

We will never pass your personal details to any of our clients, for any job role/s, without obtaining your explicit consent first and discussing the role with you.

We do not use automated decision-making or profiling to assess your suitability for roles.

We respond to every candidate who applies for an advertised role with us as soon as possible and within a maximum of thirty (30) days with an acknowledgement email, providing a link to this Candidate Privacy Agreement on our website.

1. How We Collect Information on Candidates

Apeiro Ltd collects information on Candidates in a number of ways;

- Industry standard job boards we use to advertise roles on behalf of our clients
- Industry standard job boards where you have uploaded your CV to seek a role
- You contact us through social media e.g. LinkedIn
- You apply directly through our website
- You contact us directly regarding a role or opportunity

2. What information We Collect and Use on Candidates

Information about you that we collect and use includes:

- Information about who you are e.g. your name, contact details and CV
- Information about your contact with us e.g. phone calls, emails, text messages, interviews
- Information you may provide us about other people e.g. for the purpose of references
- Information you may provide us with in order for us to process a contract role e.g. your Ltd Company details, VAT Registration Certificate, Insurance Certificate, Bank Account details, date of birth, NI Number
- Information you may provide us with in order to process a permanent role e.g. Referees, Passport No, salary requirements, location preferences

3. Where we Collect your Information

We may collect your personal information directly from you, or from a variety of sources, including:

- Your Curriculum Vitae supplied to us by you
- Your Curriculum Vitae posted by you on a Job Board
- A response by you to a job advertisement
- An application form you submit to us for a role
- Telephone conversations with us
- Emails and/or letters you send to us
- Our online services such as our website or social media
- A Contractor Registration Form submitted by you to us

4. What we collect and use your information for – Lawful Basis for Processing

We take your privacy seriously and we will only ever collect and use information which is personal to you where it is necessary, fair and lawful to do so. We rely on your explicit consent as the lawful basis for processing and will collect and use your information only where:

- You have given your consent for us to put you forward for a job role with one of our clients and for which we will require some personal information including your name, address, Curriculum Vitae and salary requirements
- You have given us your consent to proceed with and accept a contract role with one of our clients, for which we will need to collect and process your personal data; including your Ltd Company name, address, VAT Registration Certificate, Insurance Certificate, Bank Account details, date of birth and NI Number
- You have given us your consent to hold your personal details in order to offer you further roles that become available and which we feel may be of interest to you, for which we rely on “legitimate interest” as the lawful basis on which we collect and process your personal data
- it’s necessary for us to meet our legal or regulatory obligations e.g. employment intermediary reporting, identity checks

If you do not wish us to collect and use your personal information in these ways, it may mean that we will be unable to provide you with our services or if you request a reference from us in the future.

5. Who we may share your information with

We may share your information with third parties for the reasons outlined in 'What we collect and use your information for.'

These third parties include:

- The Information Commissioner’s Office for the UK (the ICO)
- A client of ours whose role you have given your explicit consent to apply for or accept
- Third Party service providers e.g. payroll
- Law enforcement, credit and identity check agencies for the prevention and detection of crime. e.g. The Fraud Office of the police
- HM Revenue & Customs (HMRC) e.g. for employment intermediary reporting

Whenever we share your personal information, we will do so in line with our obligations to keep your information safe and secure.

6. Where your information is processed

All of your information is processed in the UK and European Economic Area (EEA) and held on secure encrypted servers with limited access.

7. Storing Your Personal Data

How we protect your information

We take information and system security very seriously and we strive to comply with our obligations at all times. 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 data when you are transmitting it to us; any transmission to us is at your own risk. Once we have received any personal information, whether on paper, online or any other media, we have appropriate safeguards applied in line with our data protection obligations.

Keeping your personal information up to date

If your personal details require changing or if you no longer want us to hold your personal data or, if you have any questions about how we use data collected which relates to you, please contact us by sending a request by email to the following contact details; info@apeiro.co.uk

We will endeavour to update your personal data within fourteen (14) working days of any new or updated personal data being provided to us, in order to ensure that the personal data we hold about you is as accurate and up to date as possible. We will also endeavour to delete your personal data within fourteen (14) working days of any request being provided to us.

How long we keep your information

Apeiro Ltd will retain your personal data only for as long as it is necessary. The length of time we will hold or store your personal information will depend on the services we perform for you and for how long you require these. Different laws also require us to keep different data for differing periods of time.

Where you have applied for a role that we are seeking to fill for a client, or you have sent us your details, we will keep your personal information for two years from the date of your first contact with us in order to provide you with our services whilst you are a candidate. If you subsequently find a role yourself, no longer require our services or wish to have your details removed from our system, please contact us using **Our Contact information** at the end of this Agreement.

Where you secure a permanent or contract role through Apeiro Ltd to one of our clients, we will keep your details only for as long as we are legally required to do so, in order that we can meet our legal, tax and regulatory obligations and in accordance with applicable U.K Tax Law.

8. Your individual rights

Under the General Data Protection Regulation (GDPR) you have a number of important rights in relation to how Apeiro Ltd uses your information. They are:

- **Right to be informed** - You have a right to receive clear and easy to understand information on what personal information we have, why and with whom we share it with.
- **Right of access** - You have the right of access to your personal information. If you wish to receive a copy of the personal information we hold on you, you may make a data subject access request (SAR), for which there is no charge.
- **Right to request that your personal information be rectified** - If your personal information is inaccurate or incomplete, you can request that it is corrected.
- **Right to request erasure** – also known as the right to be forgotten. You can ask for your information to be deleted or removed if there is not a compelling reason or regulatory obligation for Apeiro Ltd to continue to have it.
- **Right to restrict processing** - You can ask that we block or suppress the processing of your personal information for certain reasons. This means that we are still permitted to keep your information – but only to ensure we don't use it in the future for those reasons you have restricted.
- **Right to data portability** - You can ask us for a copy of your personal information to be transferred directly from one organisation to another if it is technically possible to do so.
- **Right to object** - You can object to Apeiro Ltd processing your personal information where for e.g. if we were using it for historical research and statistics.

For further information on each of these rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals rights under the General Data Protection Regulation.

If you would like to exercise any of these rights, please:

- email or write to us
- let us have enough information to identify you (e.g. your name, the email used to register with us and your postcode)
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or statement), and
- let us know the information to which your request relates

How to make a complaint

We will always strive to collect, use and safeguard your personal information in line with data protection laws and we hope that we can resolve any query or concern you raise about our use of your information.

If you do not believe we have handled your information as set out in this agreement, please contact us using the Contact Information below and we will do our utmost to put things right. If you are still unhappy, The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/>

Our Contact information:

Apeiro Ltd

180 Piccadilly,

London.

W1J 9HG.

Telephone Number: 0845 6808402

Email: info@apeiro.co.uk

Changes To Our Candidate Privacy Agreement

We reserve the right to modify this Candidate Privacy Agreement at any time. Any changes we may make to our Candidate Privacy Agreement in the future will be made available to you to view using our Website. Your continued use of our services and our Website shall be deemed your acceptance of the varied Candidate Privacy Agreement.

May 2018