

Last reviewed May 2018

Cellence Privacy Statement

1. Introduction

Cellence Plus is committed to keeping your personal information secure, private, accurate and available. Whether we are in the process of finding you the right role for your needs, continuing our relationship with you once we have found that role or providing a service, your rights to privacy are our number one priority.

This privacy statement, together with any terms of use of our website and systems, explains what personal data we collect, why we collect it, what we use it for, who it is shared with and how it is kept secure. It also details how your rights to privacy are maintained, and who to contact should you have any queries about how your data is processed.

This privacy statement applies to the personal data of our website users, candidates, clients, suppliers, and other people whom we may contact in order to find out more about our Candidates. For internal employees, a separate Data Protection Policy is available internally describing how employee personal data is processed.

For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR"), the company responsible for your personal data, the data controller, are:

Cellence Plus

9-15 Sackville Street,

Mayfair, London

W1S 3DJ

This privacy statement applies to Cellence Plus business operations within the EU. It is important to point out that we may amend this privacy policy from time to time. Please just visit this page if you want to stay up to date, as we will post any changes here.

2. Candidate Personal Data

What personal information do we collect and why?

In order to provide the best possible employment opportunities that are tailored to you, we need to process certain information about you. We only ask for details that will genuinely help us to help you, such as your name, contact details, education details, employment history, and visa information (and of course you may choose to share other relevant information with us). Where appropriate and in accordance with local laws and requirements, we may also collect information related to your health, diversity information or details of any criminal convictions, should you consent to provide it.

A list of the personal information we may collect is shown in the table below. Please note that this list is not exhaustive.

| Name | Address | Email Address |
|--|--|--|
| Further details including Phone, Skype, WhatsApp | Employment Information | Educational History |
| Right to Work Status or Documents | Passport Information | Visa Information |
| Salary and total remuneration information | Driving License Details | Employment References |
| Social media information | Any Aptitude, Personality or Psychometric Test Results | Extra information that you choose to tell us |
| Extra information that | Extra information that your referee | Authorised Background checks |

| | | |
|-----------------------------------|------------------------------|--|
| our Clients may tell us about you | chooses to tell us about you | |
|-----------------------------------|------------------------------|--|

How do we collect your personal data?

There are three main ways in which we collect your personal data:

- 1. Directly from you.** Personal data received directly from you may be received in numerous ways, including, but not limited to:
 - Emailing your CV to our enquiries mailbox or directly to an employee;
 - Providing a hard copy of your CV to our offices or at recruitment fairs;
 - Applying for jobs through a job board or job aggregator;
 - Providing a business card or similar contact details to one of our employees
 - A referral from someone you have passed your resume on to with the explicit intent of being passed to our business and/or group company.
- 2. From information on public forums such as the Internet.** Personal data obtained from public forums such as the Internet may include:
 - Contact details obtained from LinkedIn, Facebook and other social networking sites;
 - Personal data obtained from job boards, forums and other professional websites.
- 3. From third parties.** We may also receive personal data about you from third parties. Depending on the relevant circumstances and applicable local laws and requirements, these may include personal data received in the following situations:
 - Your referees may disclose personal information about you;
 - Our clients may share personal information about you with us;
 - We may obtain information about you from searching for potential candidates from third party sources;

The data you supply directly to us will be held for a reasonable period to be considered for other roles under our legitimate interest.

In instances where your personal data is obtained from public sources such as the Internet, or from third parties, we will balance your privacy rights with our legitimate interests to determine whether the activity could be considered invasive or cause a risk to your rights and freedoms. This is achieved through a legitimate interest's assessment, which you can request a copy of at any time by contacting us via telephone, email or post using the contact details below. If the activity is considered a risk to your rights and freedoms, we will terminate it immediately.

Where you have not provided your information directly, we will always inform you about how we have obtained your personal data within 30 days and provide you with an opportunity to object to processing at any time. Should you confirm you are happy for us to retain your details to be considered for other roles, we will handle your information in a secure manner and for a reasonable period to be considered for other roles.

How do we use your personal data?

We will only ever use your personal information for recruitment purposes, to be considered for roles with our clients that we feel would match your skills and experience. As part of this recruitment process, we may use your personal information for the following activities:

- Collecting your data from you and other sources as listed above;
- Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to recruitment;
- Providing you with our recruitment services and to facilitate the recruitment process;
- Assessing data about you against vacancies which we think may be suitable for you;
- Sending your information to Clients, in order to apply for jobs or to assess your eligibility for jobs;
- Carrying out our obligations arising from any contracts entered into between us;

- Verifying details you have provided, or to request information (such as references, qualifications and potentially any criminal convictions, to the extent that this is appropriate and in accordance with local laws); and
- Complying with our legal obligations in connection with the detection of crime.

Who do we share your personal data with?

We may share your personal data with various parties, in various ways and for various reasons. Primarily we will share your information with prospective employers to increase your chances of securing the job you want. This includes:

- Potential employers to be considered for relevant roles;
- Third parties who provide a service to Cellence e.g. data processors;
- Group companies where roles may be suitable for you; and
- Joint venture organisations consisting of one or more employer, where relevant to your skills and experience.

We will only ever share your information for recruitment purposes, and will ensure that a secure method of sharing personal information is used.

How do we protect your personal data?

We care about the security of your personal data. That's why we have a number of technical and organisational measures in place to safeguard your data at all times. If you want to find out more information about the controls we have in place, you can contact us using the contact details contained within this document.

How long do we keep your personal data for?

If we have not had meaningful contact with you (or, where appropriate, the company you are working for or with) for a period of three years, we will delete your personal data from our systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation).

Where you haven't provided personal data to us directly, we will inform you that we are processing your personal data within 30 days and delete any data from our systems at your request.

What are your rights?

We are committed to ensuring you are aware of your rights to privacy and are able to exercise these as you see fit. This section outlines your rights in more detail:

Right to object: If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.

Right to withdraw consent: Where we have obtained your consent to process your personal data for certain activities (for example, for assessing your suitability for certain roles), you may withdraw your consent at any time.

Data Subject Access Requests (DSAR): Just so it's clear, you have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or delete such information. At this point we may comply with your request or, additionally do one of the following:

- We may ask you to verify your identity, or ask for more information about your request; and
- Where we are legally permitted to do so, we may decline your request, but we will explain why if we do so.

Right to erasure: In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to "erase" your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If we do agree to your request, we will delete your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. That way, we will minimise the chances of you being contacted in the future where your data are collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.

Right of data portability: If you wish, you have the right to transfer your data from us to another data controller. We will help with this – either by directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format.

Right to lodge a complaint with a supervisory authority: You also have the right to lodge a complaint with your local supervisory authority. In the UK, the supervisory authority is the Information Commissioners Office.

How can you contact us?

You can contact us with any questions, queries or requests by writing at the following address:

Cellence,
9-15 Sackville Street,
Mayfair, London
W1S 3DJ

Or via e-mail at the following address:

compliance@cellenceplus.com

3. Clients and Suppliers Personal Data

What personal information do we collect and why?

The data we collect about clients is actually very limited. We generally only need to have your contact details or the details of individual contacts at your organisation (such as their names, business telephone numbers and business email addresses) to enable us to ensure that our relationship runs smoothly. We may also hold extra information that someone in your organisation has chosen to tell us. If we need any additional personal data for any reason, we will let you know.

Similarly, for suppliers we only retain contact details to ensure the supplier relationship is maintained. This includes name, business email address, and business phone number which is only ever used for contact purposes.

How do we collect your personal data?

Personal data about clients and suppliers is provided directly through communications and as part of contracts.

How do we use your personal data?

Client and supplier personal data is only ever used for contractual and contact purposes.

Who do we share your personal data with?

Client contact data may be shared with candidates in order to facilitate the recruitment process. Basic personal data of suppliers may be supplied with the supply chain where required. Other than that, client and supplier personal data is only used for internal contractual purposes.

How do we protect your personal data?

Client and supplier personal data is secured using the same technical and organisational controls implemented at Cellence Plus. For specific information on the controls in place, please contact us using the contact details below.

How long do we keep your personal data for?

Client and supplier personal data is only retained for the duration of the contract, unless legal or contractual reasons require us to retain for longer.

What are your rights?

Clients and suppliers are entitled to the same rights as candidates under data protection legislation. For more information, please see 'What are your rights?' under the Candidate section above. These rights are subject to legal and contractual requirements which may supersede your rights. Where this is the case, we will provide you with a detailed explanation.

How can you contact us?

You can contact us with any questions, queries or requests by writing at the following address:

Cellence,
9-15 Sackville Street,
Mayfair, London
W1S 3DJ

Or via e-mail at the following address:

compliance@cellenceplus.com

4. Website Users

What personal information do we collect via this website and why?

We collect a limited amount of data from our Website Users which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, and the times that our website is most popular.

What are cookies and how do we use them?

A "cookie" is a bite-sized piece of data that is stored on your computer's hard drive. They are used by nearly all websites and do not harm your system. We use them to track your activity to help ensure you get the smoothest possible experience when visiting our website. We can use the information from cookies to ensure we present you with options tailored to your preferences on your next visit. We can also use cookies to analyse traffic and for advertising purposes.

If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.

How to reject cookies

If you don't want to receive cookies that are not strictly necessary to perform basic features of our site, you may choose to opt-out by changing your browser settings.

Most web browsers will accept cookies but if you would rather we didn't collect data in this way you can choose to accept all or some, or reject cookies in your browser's privacy settings. However, rejecting all cookies means that you may not be able to take full advantage of all our website's features. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

For more information generally on cookies, including how to disable them, please refer to aboutcookies.org. You will also find details on how to delete cookies from your computer.