Arete Research Services LLP Privacy Notice for Recruitment Candidates

Arete Research Services LLP ("Arete") is aware of its obligations under the UK General Data Protection Regulation (UKGDPR) and other data privacy legislation in force in the UK. We are committed to processing your data securely and transparently. This privacy notice sets out the types of personal data that we collect and process about recruitment candidates. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

1. Who we are

Arete is the data controller in relation to your personal data, meaning that it determines the processes to be used when using your personal data. You may contact us at:

Privacy Officer Arete Research Services LLP 1st Floor 10 Ely Place London EC1N 6RY Tel: 0207 959 1300 E-mail: dataprivacy@arete.net

2. Data protection principles

In relation to your personal data, we will:

- Process it fairly, lawfully and in a clear, transparent way
- Collect your data only for specified and specific purposes
- Only collect the minimum information we need to meet the purpose
- Only use it in the way that we have told you about
- Ensure it is correct and up to date
- Keep your data for only if we need it
- Process it securely, reducing the risk of it being lost or stolen

3. What data we collect about you

Personal data means any information capable of identifying an individual. We may process certain types of personal data about you as follows:

- Identity Data may include your first and last name
- Contact Data may include your email address and telephone number
- Employment Data may include your employment and academic history, usually in a CV
- Offer Data may include the terms of an offer

We do not collect sensitive data about recruitment candidates or data of anyone under the age of 16.

4. Why we process your data

There are six lawful reasons for processing personal data, which are:

- You give consent for us to process your data;
- It is necessary to fulfil a contractual obligation;
- It is necessary for us to comply with our legal or regulatory obligation;
- It is necessary in the legitimate interest of Arete to do so;
- It is in the public interest to do so; and
- It is in your vital interest to do so.

We hold the following personal data of recruitment candidates:

Data	Purpose	Lawful basis	Retention policy
CV	Used to establish if a candidate is suitable for a role Used to contact the candidate	Unsuccessful candidate - Legitimate interest	Retained for 6 months from the end of the recruitment process
	during the recruitment process	Successful candidate - Regulatory/Legal	Retained for duration of employment and 7 years thereafter as part of our Staff Privacy Policy
Offer letter	Confirmation of role, terms and conditions	Candidate not accepting offer - Legitimate interest Candidate accepting offer - Contractual	Retained for 6 months from the end of the recruitment process Retained for duration of employment and 7 years thereafter as part of our Staff Privacy Policy

5. How we collect your data

We collect personal data about you through a variety of different methods including:

- **Direct interactions:** You may provide data when emailing your CV to us on a speculative basis, responding to a job advertisement or contacting us via LinkedIn.
- Third parties or publicly available sources: We may receive personal data about you via third party recruitment firms or platforms.

6. Sharing your data

Your data will be shared within Arete where it is necessary for staff to consider your suitability for a role. As part of email and server back-up services, we also share some of your data with outsourced IT providers (Microsoft and Global Relay). We may also share your data with third parties to comply with a legal obligation upon us.

Whilst your data is stored by third parties within the UK, we do share access to your data with our offices in US and Hong Kong. Whenever we transfer your personal data out of the UK to countries

which have laws that do not provide the same level of data protection as the UK law, we always ensure that a similar degree of protection is afforded to it by ensuring that the following safeguards are implemented. We use the UK Addendum to the EU Standard Contractual Clauses as our appropriate safeguards for such restricted transfers outside of the UK. To obtain a copy of these contractual safeguards, please contact us using the contact details set out above

7. Protecting your data

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such. In addition, third parties must implement appropriate technical and organisational measures to ensure the security of your data (see privacy policies of IT providers <u>Microsoft</u> and <u>Global Relay</u>).

8. How long we keep your data for

The retention policies are set out in the above table.

9. Your rights in relation to your data

The law on data protection gives you certain rights in relation to the data we hold on you. These are:

- **The right to be informed:** This means that we must tell you how we use your data, and this is the purpose of this privacy notice.
- The right of access: You have the right to access the data that we hold on you. To do so, you should make a subject access request. You can read more about this in our Subject Access Request policy which is available from our Privacy Officer.
- **The right for any inaccuracies to be corrected:** If any data that we hold about you is incomplete or inaccurate, you can require us to correct it.
- The right to have information deleted: If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it.
- The right to restrict the processing of the data: For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct.
- The right to portability: You may transfer the data that we hold on you for your own purposes.
- **The right to object to the inclusion of any information:** You have the right to object to the way we use your data where we are using it for our legitimate interests.
- The right to regulate any automated decision-making and profiling of personal data: You have a right not to be subject to automated decision making in way that adversely affects you.

If you wish to exercise any of the rights explained above, please contact our Privacy Officer at <u>dataprivacy@arete.net</u>.

10. How to complain

We strive to meet the highest standards when collecting and using personal information. Complaints are taken very seriously, and data subjects are encouraged to bring any issues to our attention. To do this either e-mail or write to:

Privacy Officer Arete Research Services LLP 1st Floor 10 Ely Place London EC1N 6RY Tel: 0207 959 1300 Email: <u>dataprivacy@arete.net</u>

The supervisory authority in the UK for data protection matters is the Information Commissioner's Office (ICO). If you think your data protection rights have been abused or breached in any way by us, you are able to make a complaint to the ICO at <u>https://ico.org.uk/concerns/</u>.

11. Third-party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

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