

This Privacy Policy ("**Policy**") describes how **Global Career Company** (we, us, our or Global Career Company) may use, process, store and disclose Personal Information that we may collect about individuals, including if you register with us via our Candidate Registration process, through this website and from other sources, such as when you apply for a job through job sites such as LinkedIn, Monster, Facebook (this list is not exhaustive). The types of data we collect are described in the section below '**Your Personal Information and how we collect it**'.

We act as a controller and we are responsible for the Personal Information we process. This Policy informs you how we protect your Personal Information and informs you about your privacy rights.

It is important that you read this Policy together with any other Privacy Policy we may provide such as the Policy contained in our Candidate Registration form and on specific occasions when we are collecting or processing your Personal Information so that you are fully aware of how and why we are using your Personal Information. This Privacy Policy supplements other policies you may receive from us and is not intended to override them.

This website is not intended for children and we do not knowingly collect data relating to children.

### **Contact Details**

If you have any questions about how we use your Personal Information, contact us at: [data@globalcareercompany.com](mailto:data@globalcareercompany.com).

Your Personal Information and how we collect it

### **Registering with this Website**

When you use or register with this website, we may ask for certain Personal Information including your name and contact information (email, home address and phone number). Depending on the nature of your enquiry or activities on our website, we may also ask for your job search criteria and preferences, employment experience, salary, and other background information together with any login ID and password created by you. You can request us to send you job alerts through the website by completing your job search criteria and preferences. You can stop receiving these job alerts at any time by clicking on the unsubscribe link contained in the job alert email.

### **Registering as a Candidate for work finding services**

We will collect your Personal Information directly from you and from other sources including when you apply for a job via a job board, directly through our website, from Social Media sites such as LinkedIn, or when you provide us with your details during a job fair, promotional, networking or training event. When you ask us to provide you with work finding services we will ask you to register as a Candidate. During our Candidate Registration Process we will collect your Personal Information directly from you, your CV, from employment and educational references. Our Clients may request additional Personal Information about you in relation to their job vacancies and requirements. The categories of Personal Information we may collect include:

- your Identity (your full name, previous names, evidence of change of name); gender, date of birth and marital status);

- evidence of your right to work in the UK or in other countries which may include a photograph, nationality, place of birth, birth certificate, driving licence, visas, etc (in accordance with Home Office and/or local government requirements);
- contact details including your email, home address and phone numbers;
- bank account and national insurance number
- your job search criteria, preferences and expectations;
- your qualifications, skills, experience and training;
- current remuneration and other benefits;
- motivation for joining or leaving specific employers and employment generally
- employee engagement data
- educational history;
- employment history;
- details of employment or educational referees;
- references;
- details of disabilities (where you provide this and it is relevant);
- unspent criminal / motoring convictions, court proceedings and pending court proceedings relating to an offence committed or alleged to have been committed by you;
- other information contained in your CV or that you choose to provide to us;
- technical data including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website. We may also receive technical data about you if you visit other websites employing our cookies.
- profile data including your username and password, your interests, preferences, feedback and customer survey responses;
- usage data including information about how you use our website and services;
- marketing and communications data including your marketing and communication preferences.

To provide you with work finding services our recruitment consultants will send you job alert emails matching your job search criteria and preferences. From time to time you may also receive job alerts which our consultants consider you may find interesting.

Details about your health, unspent criminal or motoring convictions, court proceedings, or any pending proceedings relating to an offence committed or alleged to have been committed by you is only processed if it is relevant (for example to enable us to assess whether these present grounds for not taking your candidate registration or job application further) and in accordance with the restrictions imposed by law. We may be obliged to disclose unspent convictions and criminal proceedings to our clients so that they can determine if these are relevant to your suitability for a role within their organisation. If you provide us with information about 3rd parties, we will assume that the 3rd party in question has given you permission to do so and to Global Career Company collecting, processing and transferring their Personal Information to the same extent as yours.

### **Our Clients and Suppliers**

If you are a Client or supplier of goods and services we will collect and process information about individuals in your organisation to enable us to communicate with them and to provide our services or receive goods and services. Usually we process the individual's name and business contact data only.

### **How we use your Personal Information**

We use, process, store and disclose your Personal Information and other data we collect including during our Candidate Registration process, to provide you with work finding services including

sending you job alerts through this website and by email, temporary assignments, project related work and permanent and fixed term contract placements, employment opportunities and career-related information. Global Career Company will process your Personal Information in accordance with this policy, applicable to the type of work you are seeking and we will disclose your Personal Information to our Clients in relation to their job vacancies. We will also process your Personal Information for other legitimate business purposes such as producing statistics, analysing the number of visitors to our website and complying with other contractual, legal and regulatory obligations and duties.

We do not use automated decision making technologies to make final or conclusive decisions about you and a member of our staff will always be involved in the provision of working finding services.

### **Change of Purpose**

We will only use your Personal Information for the purposes for which we collected it (e.g. the provision of work finding services if you are a candidate or to consider you for employment if you are a job applicant), unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your Personal Information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We may process your Personal Information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Transferring your Personal Information outside of the UK / Europe**

Global Career Company specialises in transacting and operating throughout the African continent and globally. By nature of our business, we may share some of your Personal Information with our Clients within or outside the UK and European Economic Area (EEA), who may use and process your Personal Information for similar purposes as described in this Privacy Policy. The data protection laws outside the UK and Europe may not provide an equivalent level of protection to those in the UK and in these circumstances we will take steps to ensure that your Personal Information is adequately protected, secure, kept confidential and that we have a lawful basis for the transfer. This means we may require the 3rd party recipient to sign the EU Model Contract clauses approved by the European Commission as providing personal data with the same protection that your Personal Information has when it is processed within UK/EEA.

You can contact us if you require further information on the mechanism we use when transferring your Personal Information out of the UK/EEA.

### **Disclosing your Personal Information to 3rd Parties**

To the extent necessary or appropriate and without notifying you, Global Career Company may disclose your Personal Information to external 3rd Parties in the following circumstances:

- to companies and individuals we employ to perform business functions and services on our behalf. Examples of service providers include: providing payroll services to enable us to pay our employees and temporary workers who work on client premises; background screening and verification services; data storage facilities including in Australia; hosting our Web servers; analysing data and producing statistics and legal, accounting, audit and other professional services.

- to government agencies including: HM Revenue & Customs; UK Border Agency; Home Office; Police and other law enforcement agencies; regulatory and supervisory authorities (such as the UK Information Commissioner); credit reference agencies; the Disclosure and Barring Service; and 3rd parties performing sanctions and terrorism checks.
- to comply with applicable laws, the service of legal process, or if we reasonably believe that such action is necessary to: (a) comply with the law requiring such disclosure; (b) protect the rights or property of Global Career Company or its partners; (c) prevent a crime, protect national security or for fraud detection or prevention; or (d) protect the personal safety of individuals using our website or members of the public.
- to 3rd parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, we will let you know.
- to IT consultants carrying out testing and development work on our IT systems, service providers who we may appoint as data processors and to other service providers who may be based in Australia.

Where applicable, we will impose appropriate contractual, security, confidentiality and other obligations on to 3rd party service providers and processors we have appointed, based on the nature of the services they provide to us. We will only permit them to process your Personal Information in accordance with the law and our instructions. We do not allow them to use your Personal information for their own purposes and when our relationship ends we will ensure your Personal Information is securely returned or destroyed.

Some of these 3rd parties are also controllers responsible for processing your Personal Information for their purposes, for example, HM Revenue & Customs is a controller for tax purposes. We may not be able to impose obligations or restrictions on these controllers in connection with how they process your Personal Information.

#### Keeping your Personal Information Secure

We have put in place appropriate security measures to prevent your Personal Information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Information to those employees, agents, contractors and other third parties who have a business need to do so.

We have put in place procedures to deal with any suspected Personal Information breaches and we will notify you and the applicable supervisory authority of a breach where we are legally required to do so.

#### How long we retain your personal information

Global Career Company will retain your Personal Information for as long as necessary to fulfil the purposes that we collected it for. This means we will keep your Personal Information throughout the period of your relationship with us and whilst we are providing you with work finding services.

If you no longer wish to receive our services we will continue to retain your Personal Information on our Candidate database for a further period of 5 years after our relationship ends, so that we can comply with our regulatory obligations. However we will inactivate your candidate record and limit access to your Personal Information during this period. After the 5 year retention period expires, we will delete your personal data, and if you choose to re-engage with Global Career Company, you will need to register as a new candidate and re-submit all of your information.

Depending on the nature of our relationship, we may be required by law to keep certain basic information about our Candidates, Clients and customers (including contracts, evidence of identity, financial and transaction data) for up to 7 years from when our relationship ends, for legal, compliance and tax purposes.

Where there is no retention period stated in law, we will adhere to a 2-year retention policy.

In some circumstances we may anonymise your Personal Information (so that it can no longer be associated with you and we cannot identify you). We do this for research or statistical purposes in which case we may use this anonymised data indefinitely without further notice to you.

## Your Legal Rights

You have the right to:

Make a **Data Subject Access Request** to access your Personal Information at any time. This enables you to receive a copy of the Personal Information we hold about you and to check that we are lawfully processing it.

**Request correction** of the Personal Information that we hold about you. This enables you to have any incomplete or inaccurate Personal Information we hold about you corrected, although we may need to verify the accuracy of the new data you provide to us.

**Request erasure / deletion / removal** of your Personal Information. This enables you to ask us to delete or remove your Personal Information where we do not have a valid reason to continue to process it. You also have the right to ask us to delete or remove your Personal Information where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your Personal Information to comply with local law. Please Note: we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your Personal Information where we are relying on a legitimate interest (or those of a 3rd party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your Personal Information. This enables you to ask us to suspend the processing of your Personal Information in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to process it.

**Data Portability / Request the transfer** of your Personal Information to you or directly to another controller. This right only applies to automated information which you initially provided consent for us to use or where we used the Personal Information to perform a contract with you. We will (unless there is an exemption) assist you by securely transferring your Personal Information directly to another controller where technically feasible or by providing you with a copy in a structured commonly used machine readable format. The data we can provide is:

Report Title	Candidate Information	Objects
Candidate Personal Details	Full name, address, phone number, e-mail (business/personal), nationality, place of birth, birthdate, gender.	Contact
		People Address
	Online presence URLs.	Phone
	Emergency contact name and phone.	Online Presence
Candidate Eligibility Details	National ID, tax information.	Contact
	Work visa details.	Candidate Country Eligibility
	Full name, work phone number and company name of job references.	
Candidate Skills	Education certifications and qualifications with dates.	Contact
	Industries worked in.	Candidate Skills
Candidate Work History	Work history (employer, job title/function, employment dates).	Contact
		Candidate Employment History
Candidate Job Placement	Job placement (company, job title/function, start date, end date, compensation/pay rates, worksite addresses).	Contact
		Job Order
		Company Address

**Withdraw consent at any time** where we are relying on your consent to process your Personal Information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

We want to ensure we keep your Personal Information accurate and up to date.

Additional information, Response Times and Fees

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Information (or to exercise any of your other rights or when you make an informal request). This is a security measure to ensure that Personal Information is not

disclosed to any person other than the individual who has the right to receive it. We may also contact you to ask you for further information in relation to your request to help us locate your data and to speed up our response.

We try to respond to all legitimate requests within one month. It may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You will not have to pay a fee to exercise any of these rights. However, we may charge a reasonable fee if your request is unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

#### The Legal Basis for processing your Personal Information

We have set out a short description of main ways we will collect, store, process, share and disclose your Personal Information and the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate.

We will only use your Personal information when the law allows us to. Most commonly, we will use your Personal information in the following circumstances:

- To fulfil a contract we are about to enter into or have entered into with you;
- Where it is in our legitimate interests;
- When it is our legal or regulatory duty;
- When you consent.

A legitimate interest is when we have a business or commercial reason to use your information in conducting and managing our business. We will consider and balance any potential impact on you and your legal rights when we process your Personal Information for our legitimate interests. We do not use your Personal Information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required for compliance with a legal or regulatory obligation or permitted to by law).

<b>Purpose/Activity</b>	<b>Type of Personal Information</b>	<b>Lawful basis for processing Personal Information</b>
To register you as a candidate for work finding services or when you make an employment application to us	(a) Identity	Fulfil a contract;  Legal or regulatory duty (complying with the recruitment industry and immigration regulations)
	(b) Contact details	
	(c) Evidence of your right to work in the country to which you are applying	
	(d) CV	
	(e) referees	



	(f) unspent criminal / motoring convictions	
To provide you with work finding services including: sending you details of available job opportunities and job alert emails in accordance with your job search preferences and criteria, providing career advice, providing your CV to clients in relation to their job vacancies / roles), paying your wages (if you are a temporary worker) paying your fees if you work through an umbrella or a Limited Company, and charging clients for placements we make.	(a) Identity (b) Contact details (c) Financial data (d) Transaction data (e) Marketing and Communications	Fulfil a contract; Legitimate interests Legal or regulatory duty
	a) Identity (b) Contact details	
Disclosing your Personal Information to government and law enforcement agencies and our appointed 3rd party vendors providing goods and services. including vendors located in Australia and cloud-based services	(c) Evidence of your right to work in the UK (d) CV (e) referees (f) unspent criminal / motoring convictions	Legitimate interests Legal or regulatory duty
To manage our relationship with you including:	(a) Identity	(a) Fulfil a contract
(a) Notifying you about changes to our Candidate Agreement or Privacy Policies	(b) Contact	(b) Legal or regulatory duty
(b) Asking you to leave a review or feedback or complete a survey	(c) Profile/Survey	(c) Legitimate interests (keeping our records updated and to study how candidates and potential candidates and visitors to our website use our services and website, to develop and improve them and to grow our business
	(d) Marketing and Communications	



Keeping your Personal Information secure to prevent it from being lost, used, accessed, disclosed or altered in an authorised way	(a) Identity	
	(b) Contact details	
	(c) Evidence of your right to work in the UK	Legal or regulatory duty
	(d) CV	Legitimate interests
	(e) referees	Fulfil a contract
	(f) unspent criminal / motoring convictions	
To investigate issues, disputes and complaints between us, and between us, you and our clients and to seek to resolve them	(a) Identity	
	(b) Contact	
	(c) Profile	Legitimate interests
	(d) Usage data	Fulfil a contacts
	(e) Marketing and Communications	
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity	Legitimate interests
	(b) Contact	Legal or regulatory duty
	(c) Technical data	
For Marketing and communications, make suggestions and recommendations to you about other relevant services that may be of interest to you	(a) Identity	Legitimate interests (send you salary guides and other relevant information)
	(b) Contact	
	(c) Technical data	Where we have a business relationship with you, sending you marketing based on the 'soft opt in'
	(d) Usage data	
	(e) Profile data	Your consent.
To deliver relevant website content and measure or understand the effectiveness of our advertising	(a) Identity	Legitimate interests (to study how customers use our products/services/website, to develop them, to grow our business

	(b) Contact	and to inform our marketing strategy)
	(c) Profile data	
	(d) Usage data	
	(e) Marketing and Communications	
	(f) Technical data	
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical data (b) Usage data (c) Profile data	Legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
Retaining your Personal Information for as long as necessary for the purposes of providing you with work finding services.	(a) Identity (b) Contact details (c) Evidence of your right to work in the UK (d) CV (e) referees (f) unspent criminal / motoring convictions	Legitimate interests Legal or regulatory duty
To help us respond to queries, complaints or for other reasons such as responding to requests from regulators, government and law enforcement agencies such as the Police	(a) Contact	Legitimate interests Legal or regulatory duty

## Marketing Messages

Generally we do not rely on consent as a legal basis for processing Personal Information except in relation to sending direct marketing communications via email or text message. However, where we are providing you with work finding services, you will receive email marketing communications from us even if you have not given us consent as we rely on the 'soft opt in' form of consent.

You may receive marketing communications from us if you provided us with your details when you entered a competition or registered with us at a job fair, promotional or networking event or attended a training course and you have given us consent to send you marketing. We may also use

your identity, contact details, technical data, usage data and profile data to form a view and decide which services may of interest or relevant for you.

You have the right to withdraw your consent to marketing at any time by:

- following the opt out links contained in our marketing email messages;

Opting out of receiving marketing messages does not apply to:

- Personal Information that you have provided to us as a result of your request for work finding services;
- Personal Information that you have provided to us in connection with the performance of a contract between us;
- Job alerts sent to you through the website in response to your request to receive specific job details. You can select your preferences in the Job Search section and you can stop receiving these alerts at any time by clicking on the unsubscribe link within the job alert email; and
- Job alert emails which you will receive from our recruitment consultants which match your job search criteria confirmed with you during our Candidate Registration process.

We will never sell or disclose your Personal Information to any 3rd parties to use for marketing.

#### Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookies Policy](#).

#### Links to other websites

Our website may include links to 3rd 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 3rd party websites and are not responsible for their privacy statements.

#### Feedback and Complaints

You have the right to make a complaint at any time to the UK supervisory authority for data protection issues, the Information Commissioner's Office (ICO), ([www.ico.org.uk](http://www.ico.org.uk)). We would ask you to provide us with the opportunity to discuss your concerns with you before you contact the ICO so please contact: [data@globalcareercompany.com](mailto:data@globalcareercompany.com)

#### Changes to this Privacy Policy

If we change this Privacy Policy we will post any updates here for your review.

This **Privacy Policy** came into effect on 23/05/2018 and was last updated on 23/05/2018.