

OFF TO WORK

CANDIDATE PRIVACY NOTICE PERMANENT RECRUITMENT SERVICES



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YOUR PRIVACY IS IMPORTANT TO US

Off to Work is committed to protecting your privacy and legal rights when dealing with your personal information. This Privacy Notice intends to provide clear and understandable details about the information we collect about you, how we use, share and protect it.

If you have any queries about this Privacy Notice, if you are not sure what something means, or if you wish to contact us about personal information we hold, please email us at compliance@offtowork.co.uk. We ask that you please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

WHO WE ARE

“Off to Work”, “we”, “us”, “our”, “the Company” refers to Off to Work, a trading name of Navolio Ltd. Registered in England and Wales. Registered number 03760009 and registered address: 4 Chiswell Street, London EC1Y 4UP. “You”, “your” refers to the individual gaining work finding services through Off to Work. Off to Work is registered with the Information Commissioners Office, registration number Z2961236

Off to Work is a staffing solutions provider, offering hospitality staffing, recruitment services, consultancy and training. The Company must process personal data (including sensitive personal data) so that we can provide these tailored services. In doing so, the Company acts as a data controller and/or processor. For the purposes of providing you with work-finding services, work assignments and/or information relating to roles relevant to you we will only use your personal data in accordance with the terms of the following statement.

COLLECTION AND PERSONAL DATA

We comply with GDPR obligations by storing and destroying your personal data securely, by not collecting or retaining excessive amounts of data, by protecting personal data from loss, misuse, unauthorised access and disclosure, and by ensuring that appropriate technical measures are in place to protect personal data and we ask you to keep your personal data up to date.

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You may give your personal details to Off to Work directly through our online registration form, through an application or registration form on third-party job boards, by visiting our website, marketing emails, social media, postal communications, by email, telephone and/or face to face. Indirectly, the Company may collect your data from third parties which may include job boards, LinkedIn and/or clients. The Company must have a legal basis for processing your personal data.

a. What personal data do we collect?

Please find below a more detailed look at some or all the information we may collect. The information described below is in addition to any personal data we are required by law to process in any given situation. In some jurisdictions, we are restricted from processing some of the data outlined below. In such cases, we will not process the data:

- Name
- Contact details
- Employment history
- Current basic salary & salary expectations
- Notice period
- Interview/screening notes
- Expectations in your next role such as location, position etc
- Employment references you may provide, or we receive on your behalf
- Any publicly available information visible in your LinkedIn profile
- National Insurance Number
- A copy of your bank account details
- Extra information that you choose to tell us
- Extra information that your referees choose to tell us about you
- Extra information that our clients may tell us about you
- IP address
- The dates, times and frequency with which you access our services

b. Purpose of processing

To carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us and to provide you with the information and services that you request from us or we think will be of interest to you because it is relevant to your career.

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To provide you with information about other services we offer that are similar to those that you have already been provided with or enquired about.

The core service we offer to our candidates and clients is the introduction of candidates to our clients for temporary or permanent engagement. However, our service expands to supporting individuals throughout their career and to supporting businesses' resourcing needs and strategies.

We may also use your information to review and analyse how to improve the services.

Off to Work would also like to use your contact information for internal marketing campaigns and promoting opportunities; company news, product updates, launches and invitations, gathering feedback and any other relevant information by email and text message. To give consent to the use of your data for these specific purposes please tick the marketing communications opt-in box in the 'My Data' page of your Off to Work account.

You have the right to withdraw consent for the use of your personal data in direct marketing, however, it may affect your chances to be informed about work opportunities and company updates. To withdraw consent simply untick the opt in box at any time under the My Data tab of your Off to Work account or email our marketing team on marketing@offtowork.co.uk

c. Who we share your data with

The nature of our business requires us to share your information with our clients to complete contractual obligations and work finding services.

Off to Work may share your information with service providers who help us to provide services to you or when required by law, or when it is required by a competent authority in the exercise of its duties (i.e. to investigate, prevent or act on illegal activities), or when we have your permission i.e. when requesting a reference.

Third parties are required to comply with our Privacy Notice and any other adequate technical and organisation measures. We contractually bind these service providers to the corresponding Data Processing Agreement to ensure your information is kept confidential and used only to the extent required by them to perform the services that we request and in accordance to the applicable privacy legislation. We do not sell your data to third parties.

d. Legal basis for processing

Our legal basis for the processing of personal data is our legitimate business interests, described in more detail below, although we will also rely on contract, legal obligation and consent for specific uses of data.

We will rely on contract if we are negotiating or have entered into a placement agreement with you or any other contract to provide services to you or receive services from you or your organisation.

We will rely on legal obligation if we are legally required to hold information on you to fulfil our legal obligations.

Legitimate interest

Our legitimate interests in collecting and retaining your personal data are described below:

- As a recruitment business and recruitment agency we introduce candidates to clients for permanent employment, temporary worker placements or contracts. The exchange of personal data of our candidates and our client contacts is a fundamental, essential part of this process.
- To support our candidates' career aspirations and our clients' resourcing needs we require a database of candidate and client personal data containing historical information as well as current resourcing requirements.
- To maintain, expand and develop our business we need to record the personal data of prospective candidates and client contacts.
- To deliver our ancillary services we need to contact candidates on a regular basis, through various routes such as email, phone, job alerts and other relevant notifications.

Consent

Should we want or need to rely on consent to lawfully process your data we will request your consent orally, by email or by an online process for the specific activity we require consent for and record your response on our system. You have the right to withdraw consent at any time, however this may lead to our inability to offer you further work finding services.

To withdraw consent, simply email compliance@offtework.co.uk

Consent is also requested to use your contact details for direct marketing, which can be freely given and withdrawn at any time by emailing compliance@offtework.co.uk

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Contractual/Legal requirement

We are entitled to use your data to fulfil contractual obligations with you, or where it is required by law and/or a contractual requirement (i.e. when our clients require your personal data). You are obliged to provide the personal data and if you do not the consequences of failure to provide the data is the inability to be offered work finding services through Off to Work.

e. Recipient/s of data

The Company may process your personal data and/or sensitive personal data with some of the following recipients: our clients, Calendly, Dropbox, Text Anywhere, Voyager Infinity, LevelUp.

Automated decision making

We do not use our computer systems to search and identify personal data on accordance with parameters set by a person. A person will always be involved in the decision-making process.

Where we store and process your personal data

All information you provide us is stored on our secure servers.

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 your data transmitted to our site and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Overseas Transfers

We want to make sure that your data is stored and transferred in a way that is secure. For the purposes of providing you with assignments outside of the European Economic Area or EEA (The Member States of the European Union, together with Norway, Iceland and Liechtenstein), we will therefore only transfer data outside of the EEA where it is compliant with data protection legislation and the means of the transfer provides adequate safeguards in relation to your data.

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Data Retention

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate business interests and that you are happy for us to do so.

We will hold personal information on our systems for three years after the last instance of two-way communication with you as an individual. At that point we will contact you to see if you wish to remain on our system.

If you are a candidate who has been placed by us with a new employer, we will hold your data for 5 years in line with employment legislation.

We will do the following to try to ensure your data is accurate:

- Prior to making an introduction we verify that we have accurate information about you.
- We keep in touch with you so you can let us know of changes to your personal data.

Your Rights

You have the following data protection rights, however please note that the rights are not absolute. The only absolute right you have is to request that we do not use your personal information for direct marketing.

Please do contact us if you are unsure about your rights as detailed below. We will always endeavour to help explain how your rights apply to the personal information we process, for our specified lawful reasons.

- The right to be informed about the personal data the Company processes on you. We are obliged to provide this in a clear and concise manner.
- The right to access to the personal data the Company processes on you. This is known as a Subject Access Request or 'SAR'. You also have the right to request a copy of your personal data that we process.
- We will need to identify you using reasonable means before we will start the process of collating your personal information. Once we have identified you, we will reply to any requests for your personal information (SARs) within 30 days, unless we deem the request to be complex, or repetitive, where we will notify you that we may take up to an additional two months to provide your personal information.
- We will not charge you to request information from us. However, we will charge a reasonable fee (considering the administrative costs of providing the information) if

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the request for information is repetitive. If we've provided information to you and you wish to request it again, we ask that you contact us beforehand to discuss what our reasonable fee is.

- The right to rectification of your personal data. However, we can only consider requests to correct factual information.
- The right to erasure of your personal data in certain circumstances. If you have subscribed to any of our marketing correspondence, you have the right to request erasure from our email list. We will only use your personal information to send you marketing material if you have given us your explicit permission.
- The right to restrict processing of your personal data. This means that we will stop actively processing it, and it will just be stored. Stopping processing will mean that we will not add any additional information to your existing information.
- The right to data portability in certain circumstances.
- The right to object if processing of your personal data is based on legitimate interests, or if processing is being used for direct marketing.
- The right to withdraw consent at any time.

To make things easier for you to exercise the above-mentioned rights, simply send a request to our Compliance team at compliance@offtework.co.uk. Where you have consented to the Company processing your personal data and sensitive personal data you have the right to withdraw that consent at any time by again emailing compliance@offtework.co.uk or by post to Off to Work, 4 Chiswell Street, London EC1Y 4UP.

Changes to the Privacy Notice

We reserve the right to amend this Privacy Notice from time to time. Amended policies will be published through your Off to Work account, where you may be required to accept the Privacy Notice upon logging in. If you do not agree to the new Privacy Notice, you may terminate your account at any time by emailing compliance@offtework.co.uk

Complaints or Queries

If you wish to complain about this Privacy Notice or any of the procedures set out within it, please contact our Data Protection Officer, Lucie Edwards on lucie.edwards@offtework.co.uk or by post to Off to Work, 4 Chiswell Street, London EC1Y 4UP.

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You also have the right to raise concerns with the Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, or if you believe that your data protection rights have not been adhered to.