

GFG PRIVACY STATEMENT

PUBLISHED 5th NOVEMBER 2020

We ask that you read this website privacy policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

This website privacy policy is divided into the following sections:

- Who we are
- Our website
- Our collection and use of your personal information
- Transfer of your information out of the UK and EEA
- Cookies and similar technologies
- Marketing
- Your rights
- Keeping your personal information secure
- How to complain
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- How to contact us
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Who we are

This website is operated by Wyelands Capital Limited.

We collect, use and are responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union and the United Kingdom and we are responsible as 'controller' of that personal information for the purposes of those laws.

Our website

This privacy policy relates to your use of our website, which hosts recruitment software supplied by Net-Worx (2001) Ltd, trading as Networx.

Our collection and use of your personal information

We collect personal information about you when you access our website, register with us, contact us, post material to our website, as part of the recruitment process.

We collect this personal information from you either directly, such as when you access our website, register with us, contact us, post material to our website or indirectly, such as your browsing activity while on our website (see 'Cookies' below).

We also collect personal information about you from other sources as follows:

- Personal data from referees that you have supplied to us in connection with the role you have applied for.

The personal information we collect about you depends on the particular activities carried out through our website. This information includes:

- your name, address and contact details

- date of birth
- bank account and payment details
- details of any feedback you give us by phone, email, post or via social media
- your account details, such as username, login details
- your previous work history (CV, past salaries, etc.)
- equal opportunities monitoring information (defined as special categories data). Please note this is only recorded for statistical analysis and monitoring purposes
- answers to application questions
- any other information you provide us in support of your application

We use this personal information to:

- create and manage your account with us
- verify your identity
- assess your suitability as a candidate for the role that you have applied for

This website is not intended for use by children and we do not knowingly collect or use personal information relating to children.

Our legal basis for processing your personal information

When we use your personal information we are required to have a legal basis for doing so. There are various different legal bases on which we may rely, depending on what personal information we process and why.

The legal bases we may rely on include:

- **consent:** where you have given us clear consent for us to process your personal information for a specific purpose
- **contract:** where our use of your personal information is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract
- **legal obligation:** where our use of your personal information is necessary for us to comply with the law (not including contractual obligations)
- **public task:** where our use of your personal information is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law
- **legitimate interests:** where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal information which overrides our legitimate interests)

Further information—the personal information we collect, when and how we use it

For further details on when we collect personal information, what we collect as well as how we use it, please read the following sections:

When information is collected	What information we ask for	How and why we use your information
When you register with us	Contact details: your name, address, email address, phone numbers. Career history and previous salary	We ask for this: - to create and manage your account with us - to communicate with you about your account and potential roles that you may be interested in We rely on your consent and legitimate interest as the lawful basis for collecting and using your personal information. Our legitimate interests are that the information provided is required to keep you informed as to potential roles that you may be interested in We will keep this information until: - you close your account with us - we close your account
When you apply for a role with us	Contact details: your name, address, email address, phone numbers (if not already supplied). Career history and previous salary (if not already supplied) Role you are applying for Salary expectation	We ask for this: - to assess your suitability for a role that you have applied for - to keep you informed about your application process We rely on your consent and legitimate interest as the lawful basis for collecting and using your personal information. Our legitimate interests are that the information provided is required to assess your suitability for any role you may have applied for. We will keep this information until: - you close your account with us - we close your account

Your personal data will only be shared for the specific role that you have applied for and with the relevant person(s) involved with the recruitment process. If you have requested that you are contacted for other relevant positions, we will request for your consent prior to opening any discussions to adhere to GDPR regulations.

We will not share your personal information with any other third party.

We will share personal information with law enforcement or other authorities if required by applicable law.

Cookies and other tracking technologies

A cookie is a small text file which is placed onto your device (eg computer, smartphone or other electronic device) when you use our website. We use cookies on our website. These help us recognise you and your device and store some information about your preferences or past actions.

For further information on cookies, our use of cookies, when we will request your consent before placing them and how to disable them, please see our https://www.gfgalliance.com/privacy/

Marketing

We would like to send you information about roles within the GFG Alliance, which may be of interest to you. Where we have your consent or it is in our legitimate interests to do so, we may do this by post, email, telephone, text message (SMS) or automated call.

We would also like to share your information with selected entities within the GFG Alliance so that they may send you information about potential roles, depending on what you agree with us.

If you have previously agreed to being contacted in this way, you can unsubscribe at any time by:

- contacting us at london.hr@libertyhouseuk.com
- using the 'unsubscribe' link in emails or 'STOP' number in texts
- updating your marketing preferences when you set up job alerts

It may take up to 14 days for this to take place.

For more information on your rights in relation to marketing, see 'Your rights' below.

Potential lawful basis	Comment
The processing is necessary for the purpose of the marketer's legitimate interests except where those interests are overridden by those of the data subject. See Article 6(1)(f) of Regulation (EU) 2016/679.	Recital 47 of the GDPR acknowledges that processing personal data for direct marketing purposes may be regarded as carried out for a legitimate interest. If a data controller intends to rely on legitimate interests as the lawful basis for direct marketing, it will need to conduct a legitimate interest assessment.
The data subject has given their consent to processing for the purpose of direct marketing. See Article 6(1)(a) of Regulation (EU) 2016/679.	The GDPR has raised the bar for obtaining consent generally. Consent must be freely given, specific, informed and unambiguous. Consent requests must be separate from other terms and conditions and require a positive action to opt in. Opt-out consent is not permitted under the GDPR. For this reason, many organisations will prefer to rely on legitimate interest as the lawful basis for direct marketing activities. However, for automated telephone or electronic marketing, consent may be required under PECR 2003 in any event.

Your rights

Under the General Data Protection Regulation you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your use personal information
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws

For further information on each of those 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 those rights, please:

- email, call or write to us at london.hr@libertyhouseuk.com
- let us have enough information to identify you such as Full Name, User Name, Address, Email Address and Date of Birth.
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates **i**ncluding any account or reference numbers, if you have them
- If you wish to deactivate your account, this can be done by logging into your account and selecting deactivate.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

Please contact us at london.hr@libertyhouseuk.com if you have any questions about this privacy notice or the information, we hold about you.

If you wish to contact us, please send an email to london.hr@libertyhouseuk.com or write to 7 Hertford Street Mayfair London W1J 7RH United Kingdom or call +44 (0) 203 205 8550.

Do you need extra help?

If you would like this website privacy policy in another format (for example: audio, large print, braille) please contact us (see 'How to contact us' above).

We hope that we can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you the right to lodge a complaint with a supervisory authority, in particular in a European Economic Area state or in the United Kingdom if you work, normally live or if any alleged infringement of data protection laws occurred in the relevant state. The supervisory authority in the UK is the Information Commissioner who may be contacted at https://ico.org.uk/concerns/ or telephone: *0303 123 1113*.

Changes to this website privacy policy

This website privacy policy was published on 5th November 2020 and last updated on 5th November 2020.

We may change this website privacy policy from time to time, when we do, you will be informed when you next login to Networx Applicant Tracking System.