

## Compliant privacy policy (Stonefort Marine Talent)

### LEGAL BASES FOR PROCESSING DATA

#### 1. Legitimate Interests

We believe that we have a legitimate interest in processing your data for the purposes of providing work seeking services to both our clients and candidates.

#### 2. Candidates

- We believe that it is reasonable to assume, if you are looking for employment, that you are happy for us to collect and use your data to offer or provide you with work-seeking services.
- We have to comply with various legal, regulatory and tax obligations and we have a legitimate business interest in doing so. Therefore we may share your data with the appropriate authorities to meet these obligations.
- We want to help you find a job. We believe that sending you job recommendations and relevant market intelligence will facilitate this. We will process your data to send you appropriate content.

#### 3. Clients

To ensure that we can provide you and your organisation with the best possible service we store details of your organisation and its contacts as well as notes of conversations, emails, meetings and previous jobs and recruitment activity. We believe that this falls within our legitimate interest in providing recruitment services to you.

#### 4. Consent

In certain cases, such as processing sensitive data, we will need to obtain your consent. In these cases:

- You should be allowed to give your consent freely
- We will ensure you are aware what you are consenting to
- You should be able to control your consent
- We will keep a record of your consent
- You have the right to withdraw your consent

#### 5. Establishing, exercising, or defending legal claims

Occasionally we may need to process your data when it is necessary for the establishment, exercising or defending of legal claims or whenever the courts are acting in their judicial capacity.

## COLLECTION OF PERSONAL DATA

### 6. Candidates

During the course of providing you with work-seeking services, we may collect some or all of the following types of personal data. The following list is not exhaustive and is in addition to any data that we are required by law to process:

- Name
- Contact details
- Sex/gender
- Date of birth
- Education
- Employment history
- Immigration status
- Nationality
- Copy of passport / ID card / other form of identification
- Tax information such as social security numbers
- Details of criminal convictions where applicable to the role
- Current salary and package
- Any further information that you tell us included in future employment preferences
- IP addresses
- Dates that you make contact with our organisation

### 7. Clients

We will collect data that will help us ensure that the relationship between our organisations runs as smoothly as possible. This will normally be restricted to your name, telephone number and email address of individual contacts. We may also hold IP addresses if you visit our websites.

### 8. How we collect your personal data

#### Candidates

We collect personal data from you in three ways:

**Personal data that you give us.** We need to know certain information about you in order to provide work-seeking services to you. This will enable us to make better matches and to identify the most appropriate roles for you. The ways in which you can provide us with this information includes:

- Sending us a copy of your CV electronically or by post
- Applying for a role via a job board which then redirects you to our website
- Personal data that we receive from third parties

**We may receive personal data about you from third parties** and these can include:

- Our clients may share information about you
- Your referees may share information about you
- We may obtain data about you from websites such as job boards and LinkedIn
- Through social media channels
- Personal data that we receive automatically

**We may automatically collect data** about you as a result of you visiting our website and clicking on emails.

## **Clients**

We collect personal data from you in three ways:

**Personal data that you give us.** To help us provide the best service to you and send you the most appropriate candidates we receive data as follows:

- You contact us by phone or email
- We contact you by phone or email, either during the normal course of business or as a result of our business development efforts
- Personal data we receive from other sources

**We may seek and obtain additional information** about you as part of our business development and due diligence processes.

- From offline and online media
- Delegate lists from meetings, events and conferences
- Personal data that we receive automatically
- 

**We may automatically collect data** about you as a result of you visiting our website and clicking on emails.

## **9. How we use your personal data**

### **Candidates**

We use your data for a number of purposes:

- Work Seeking Services

We provide work seeking services to candidates. We want to connect you to relevant opportunities as they arise. We may use your data in the following ways if we deem it necessary to do so for our legitimate interest. The ways in which we might use and process your data is as follows. Again this list is not exhaustive:

- Submitting your data to prospective employers to apply for jobs
- Assessing your data against open vacancies to determine your suitability
- To provide you with work-seeking services

- Storing your details on our database so that we can contact you in relation to future vacancies
- To provide you with job alerts and other work seeking related communications
- To enable us to meet our obligations of any contracts between you and us
- To enable us to meet our obligations of any contracts between us and third parties with regard to your recruitment
- Facilitating of payroll and invoicing processes
- Verifying details that you have provided (e.g. references, qualifications and criminal convictions)
- This can include forwarding your details to prospective employers or matching your details against our open vacancies. Prospective employers might want to verify certain aspects such as references and qualifications.
- Complying with our legal obligations
- Marketing Activities

Where you have previously contacted us (such as registering on our website, submitting a CV, applying for a job) we may send you details of recruitment related services as we believe that this will be beneficial in your job search, particularly where we send you details of vacancies similar to the one you specifically applied for. We may also ask you to participate in salary surveys and job-related questionnaires to provide us with benchmarking data to better advise in your job search.

**Sensitive Personal Data.** We may need to collect sensitive personal data such as medical information and criminal convictions if required for a specific role. We will only do this with your explicit consent. You may withdraw your consent at any time.

**To help establish, exercise or defend a legal claim.** Occasionally we may need to use your data to establish, exercise or defend a legal claim.

## Clients

We use your data for a number of purposes:

- Recruitment Services

Our primary function is to provide you recruitment services including presenting you with candidates; providing market intelligence such as salary surveys; and provision of recruitment process outsourcing services. To enable us to provide these services we will process your data in the following ways:

- Storing your data on our database so we can contact you in relation to recruitment activities
- Recording notes of conversations and meetings
- For targeted marketing campaigns
- Customer satisfaction surveys
- To help establish, exercise or defend a legal claim

Occasionally we may need to use your data to establish, exercise or defend a legal claim.

## 10. Who we share your personal data with

We share your data with a variety of other parties during the course of conducting our business, in a number of ways, for a number of reasons. They are as follows:

### Candidates

- Stonefort Marine Consultancy
- Our clients and other recruitment businesses in the performance of finding suitable employment for you
- Third-party IT companies with whom we are contracted and have appropriate data processing agreements

## 11. How we safeguard your personal data

We take all reasonable steps to ensure that your data is safe and protected from misuse, loss or unauthorised access. We ensure this by implementing a range of technical safeguards and operational processes. We also have processes to deal with any suspected data breach.

If you suspect that your data has been misused, or has been compromised please contact us at [xxxxxx@xxxxxx.com](mailto:xxxxxx@xxxxxx.com)

## 12. Retention policy

We will not retain your data longer than we need it. In certain cases, we are required to hold your data to comply with tax, legal or regulatory issues, for instance, payroll records. Subject to this, we will delete your data if we haven't had any relevant contact from you (or for clients, the company you work for or with) for a three-year period.

For the purposes of this policy, relevant contact means:

- Communicating with us via email, telephone or mail
- Submitting your CV or applying for a role
- Registering and logging onto our websites
- Completing any surveys
- Clicking through from any of our marketing communications

## **Your rights**

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data that we process on you;
- The right of access to the personal data that we process on you;
- The right to rectification of your personal data;
- The right to the erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to us processing your personal data and sensitive personal data you have the right to withdraw that consent at any time by contacting our Data Controller Mark Hanson at [xxxxxxx@xxxxxxxx.com](mailto:xxxxxxx@xxxxxxxx.com)

## **Overseas Transfers**

We are an international business. We provide work seeking services to candidates and clients around the world, therefore to enable us to give you the best service possible we will sometimes need to transfer and store your data internationally. This could be:

- To overseas clients
- Our clients may transfer your data internally
- To data storage facilities
- To our suppliers where appropriate

The company may transfer only the information you provide to us to countries outside the European Economic Area (“EEA”) for the purposes of providing you with work-seeking services. We will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises of the EU member states plus Norway, Iceland and Liechtenstein.