Halcyon Recruitment Privacy Policy

Halcyon Recruitment refers to Halcyon Recruitment Ltd (registered in England and Wales No. 05372299) and Halcyon Recruitment Pte Ltd (registered in Singapore No. 201113491W, EA No 13C6663).

About this policy

We are committed to respecting your privacy. This privacy policy is to explain how we may use personal information we collect before, during and after your working relationship with us.

Halcyon Recruitment is committed to ensuring your privacy is protected. Should you provide us with personal information by which you can be identified, then you can be assured that we will use that information only in accordance with this privacy policy. All of our employees and agents who have access to or are involved in the processing of personal information respect the confidentiality of such personal information.

This policy applies to jobseekers, clients and employees.

Halcyon Recruitment may change this policy from time to time by updating this page. You should check this page to ensure that you are happy with any changes. This version of the privacy policy is effective from May 2018.

Cross-border data transfers

Information that Halcyon Recruitment collects may be stored and processed in and transferred between any of the countries in which Halcyon Recruitment operates to enable the use of the information in accordance with this privacy policy.

What is covered by this policy?

- Jobseekers: the information we collect and how we use it
- Employers: the information we collect and how we use it
- Visitors to our website
- Data Security
- Retention of your personal information
- Your right to withdraw consent to our processing of your information
- Your right to access information we hold about you.

Jobseekers: the information we collect and how we use it

As a jobseeker, when you register with us, you will be providing us with consent to process your personal information in accordance with the terms of this Policy.

We collect personal data from you in the following ways:

1 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:

- Registering on our website
- Sending us a copy of your CV electronically, in person or by post
- Applying for a role via a job board which then redirects you to our website
- Through direct communication with Halcyon employees by face to face meetings, phone, email, direct messaging

2 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, CV platforms, LinkedIn, Xing.
- Through social media channels

3 Personal data that we receive automatically

We may automatically collect data about you as a result of you visiting our website and also through emails.

To enable us to assist you in finding an appropriate job, we will gather personal information about you from your CV and our registration process. This may include some or all of the following and is in addition to any data that we are required by law to process:

- Your name
- Your contact details including your personal email address
- Your career history
- Your sex / gender
- Your date of birth
- Your education
- Your immigration status
- Your nationality
- Your qualifications
- Your passport information / ID card information / other form of identification
- Information for tax and salary purposes
- Your current salary and benefits package
- Information you provide in your registration that includes employment preferences
- IP addresses
- CCTV footage if you enter our premises

On occasions we may also record sensitive information such as:

- Criminal convictions and offences
- Information about health, including any medical condition
- Information about race or ethnicity

Uses made of this information

We will use your personal information in the following circumstances:

- Where we need to perform or take preparatory steps to perform the contract we have entered / shall enter with you
- Where we need to comply with a legal obligation
- Where it is needed to establish, bring or defend legal claims
- Where it is needed to assess working capacity on health grounds, subject to appropriate confidentiality safeguards
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests); and
- Where it is needed in the public interest

The situations in which we will process your personal information are listed below:

We hold and process this information in order to provide you with work seeking services. We may use your data in the following ways if we believe it necessary to do so for our legitimate interest:

- Assist you in finding an appropriate job
- Communicate with you regarding job opportunities and the progress of any applications you make
- To provide your details to appropriate prospective employers. We will only share your information with named prospective employers with your permission.
- Provide you with job alerts relating to roles we think you might be interested in
- Provide you with help and advice to assist in your job search
- Provide you with information about general trends in the maritime and shipping industry
- Seek your feedback on our services
- Fulfil our obligations to our clients when you are offered employment.
- Verifying details you have provided (such as references, qualifications, criminal convictions)
- Comply with our legal obligations
- Equal opportunities monitoring
- Health and safety checks
- Drug and alcohol monitoring

We may also contact you for marketing purposes where you have previously contacted us (by way of registering on our website, submitting a CV, applying for a job). This may include sending you details of recruitment related services where we believe it will be beneficial in your job search. We may also invite you to participate in market research such as employee motivation and satisfaction surveys, salary surveys and job specific and/or industry specific benchmarking. If you do not wish to receive any marketing communications from us, you can withdraw your consent by unsubscribing at any time. Please email "**unsubscribe to marketing**" to privacy@halcyonrecruitment.com.

You have the right to withdraw your consent or amend your communications preferences at any time and can do so by logging into your candidate record and amending your preferences at http://www.halcyonrecruitment.com/registration.aspx.

We may share your personal information with the following:

- Trusted third parties who provide functions on our behalf, such as reference, qualification and criminal record checking services, psychometric evaluations and skills testing, payroll services and IT services. These third parties are required to comply with our stringent undertakings relating to security and confidentiality
- Trusted third parties who provide us with research and emailing services. These third parties are required to comply with our stringent undertakings relating to security and confidentiality
 - Regulatory or law enforcement agencies, when required by law to do so.

We do not share your personal information with third parties who wish to use it for marketing purposes.

Employers: the information we collect and how we use it

When you ask us to work with you we will record information about you, including but not limited to:

- Your name
- Your job title
- Your business contact information including your business email address
- Your organisation.

We hold and use this information in order to:

- Provide the service you have asked us to provide
- Provide you with reports on the work we are undertaking on your behalf
- Advise you of relevant services and products

- Provide you with information about general trends in the world of work
- Seek your feedback on our services

You have the right to amend your communications preferences at any time. You can do so by emailing us at info@halcyonrecruitment.com.

We may share your personal information with the following:

- Trusted third parties who provide us with research and emailing services. These third parties are required to comply with our stringent undertakings relating to security and confidentiality
- Regulatory or law enforcement agencies, when required by law to do so.

Visitors to our website

We use Google Analytics and cookies to gather general information about visitors to our websites in order to better understand how our websites are used. We may share this general information with trusted third parties so they too may understand how our websites are used.

If we hold an email address for you, we may occasionally use cookies to gather information about your personal use of our websites. This is in order to provide you with a tailored service. You may find further information about our use of cookies <u>here</u>.

If you contact us through our website to submit an application, submit your CV, ask a question or download a report or document, we will ask you to agree that you accept the terms of this privacy policy and thereby give consent to the processing of your personal information.

Our websites may contain links to external websites operated by other organisations. Those organisations may collect personal information from visitors to their site. Halcyon Recruitment cannot guarantee the content or privacy practices of any external websites and does not accept responsibility for those websites.

Data Security

Halcyon Recruitment is committed to protecting the security of your personal information. We use a variety of measures, including but not limited to, firewalls and SSL encryption in order to protect your personal information from:

- Unauthorised access
- Improper use or disclosure
- Unauthorised modification or alteration
- Unlawful destruction or accidental loss.

If you suspect that your data has been misused or has been compromised please contact us immediately at <u>privacy@halcyonrecruitment.com</u>.

Retention of your personal information

We will retain your personal information for a minimum of two years. In some cases, for example when we have successfully placed you into a role or multiple roles with an employer or multiple employers, we may retain your personal information for up to seven years.

Should you wish to update your personal information at any time, if you are a jobseeker, please log in to your candidate record at <u>http://www.halcyonrecruitment.com/registration.aspx</u> and make the required changes. Other persons requiring any changes made to their personal information should email us at <u>info@halcyonrecruitment.com</u>.

Your right to withdraw consent to our processing of your information

You have the right to withdraw your consent to Halcyon Recruitment processing your personal information at any time. You can request access to your details by emailing privacy@halcyonrecruitment.com.

If you withdraw consent we will continue to store the information we hold about you but will not process this information.

If you ask us to delete the information we hold on you, you can request the deletion of your information by emailing <u>privacy@halcyonrecruitment.com</u>.

If you subsequently apply for a job through Halcyon Recruitment we will ask you to give your consent before we process your application.

Your right to access information we hold about you

You have the right to access the information we hold about you at any time, which under certain circumstances may be subject to the payment of a small fee. Where we are legally permitted to do so, we may refuse your request and will provide you with our reasons for doing so.

You may request to access the information we hold about you by emailing us at privacy@halcyonrecruitment.com.

Contacting Us

Should you wish to contact our GDPR Working Group, please do so by emailing us at privacy@halcyonrecruitment.com.

Enquiries, Issues and Complaints

If you wish to complain about this privacy notice or any of the procedures set out within it, please contact us at <u>privacy@halcyonrecruitment.com</u>.

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, if you believe that your data protection rights have not been adhered to.