

IN2PEOPLE FIRST KIG Privacy Policy

Updated 22nd August 2020

What do we do as a firm?

IN2PEOPLE FIRST KIG (hereafter referred to as IN2PEOPLE) engages in the recruitment sector. This includes but is not limited to; executive search, executive interim, market analysis projects, managed project delivery and due diligence.

As such the company gathers personal data to carry out these services to its clients.

Personal information is stored, processed and transferred at various stages of these services both during and sometimes after client engagements are completed.

We are committed to engendering a culture of **accountability**, **integrity** and **confidentiality** in all aspects of the organisation in regard to personal data and security.

Purpose of this policy:

The purpose of this policy is to confirm how IN2PEOPLE uses your personal data. This policy has been amended in response to the General Data Protection Regulation that became law in May 2018.

What does this policy cover?

- The different types of data we collect about you
- How and why we collect and use your personal data
- How long we keep your personal data
- What the legal basis is for using your personal data
- When, how and why we share your personal data
- What rights and choices you have when it comes to us using your personal data
- How you can contact us

The data we collect about you:

We use your personal data to match your skills, experience and education with a potential employer. Initially we would collect basic information in relation to your name, contact details and job role in order to share with a potential employer. Once we have your permission we may gather and share more personal information from you in the form of a CV, compensation details and references, in assessing your suitability.

We may also need to collect sensitive personal information about you that may include your nationality, visa status and other information relating to any background screening we are required to provide future employers through our contractual obligations. We would only collect this information if you provide us with your consent to do so.

How do we collect your personal data?

We may collect personal data about you from the following sources:

- From you directly
- Publicly available sources
- LinkedIn or other social networking sites
- Corporate websites
- References

- If you are not already known to IN2PEOPLE and we collect any of your personal data, we will let you know within 30 days of doing so. This will initially be via phone or email.

If we collect any sensitive personal data (as outlined above), for such data, we require your explicit consent.

When signing up or registering on our website www.in2peoplefirst.com you will need to provide the necessary details asked for.

Why do we collect your personal data?

We collect personal data to enable us to match you to career opportunities that we have been engaged to work on by our clients. This may be for a permanent employment opportunity, temporary opportunity or a consulting engagement. Collecting and exchanging personal data is an essential process in order to assess suitability for potential roles, to build market insight and our client obligations.

How long do we keep your data for?

We will only keep your personal data for as long as we need to fulfil our client obligations or our legal requirements.

Legal basis for holding your data:

The basis for holding your personal data is determined on one or more of the following reasons:

- Legitimate interest (outlined above) and where we will ensure the data is accurate and we have been transparent with you
- IN2PEOPLE's contractual obligations
- Legal obligations under applicable law to retain records for a certain period
- Your consent
- Potential disputes
- If you withdraw consent and request to be removed
- Change in guidelines relating to data protection.

Who do we share your personal data with?

We will only share your personal data with clients who have a contractual agreement with IN2PEOPLE to hire a position that may be relevant to you. We have a global client base operating in industries including: Financial Services, Professional Services and Cyber Security.

With your permission, we may be required to transfer your personal data outside the EEA for a suitable role opportunity with one of our clients. Privacy laws in these countries may be different to your home country. When we do transfer your data to a country which has not been deemed to provide adequate data protection standards, we always have security measures in place to protect your data.

Your basic personal data is also available to IN2PEOPLE employees. Sensitive personal data is restricted to certain employees or with third party suppliers who we contract with to support processing of payroll, screening processes or with government agencies.

IN2PEOPLE has a legitimate business interest in processing data to service its clients' obligations. Processing would include, but not be restricted to, updating and keeping information accurate relating to: contact details; address; employment status; employers;

roles; titles; compensation and a track record of correspondence through email, telephone conversations, face to face meetings or other communication. We recognise we have a requirement to ensure this data is accurate for the purposes of legitimate interest, contractual obligations and most importantly your rights as an individual.

Bank account data processing would only be incurred for those on the IN2PEOPLE payroll for contracting purposes (executive interim and consultancy agreements).

We may also provide data to contracted third party providers who process data for us including IT services.

What are your rights?

By law you have certain rights available to you regarding your personal data. Further information is available from your country data regulator.

These include:

- The right to be informed: You have the right to be provided with transparent, coherent information about how we use your data and your rights in relation to the use of your data. That is why we've provided this policy.
- The right of access: You have the right to access your information (if we are processing it) and certain other information (such as provided in this policy). This is so you are aware and check we are using it in accordance with the data protection law.
- The right to rectification: You have the right to have your information corrected if it is inaccurate or incomplete.
- The right to removal: This enables you to request the deletion or removal of your information where there is no compelling reason for us to continue using it. There are exceptions to the right to erasure.
- The right to restrict processing: You have the right to "block" or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We will keep a list of those who have asked for it to be restricted so that their request is respected.
- The right to data portability: You have the right to transfer your personal data to another provider. You can move, copy and transfer data easily between our IT systems and their systems safely and securely without affecting its usability.
- The right to object to processing: You have the right to object to certain types of processing, including processing for direct marketing, including for the purposes of potential opportunities.
- The right to lodge a complaint: You have the right to make a complaint about the way we handle or process your data with your national data protection regulator.
- The right to withdraw consent: If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw your consent with us for marketing purposes.

Access to your information:

You may request information about the personal data we hold. Subject access requests should be sent to john.shepherd@in2peoplefirst.com. Handling of these requests will be free of charge but we may charge a reasonable fee if we receive repeated or excessive requests

or further copies of the same information. We will respond within 30 days of submitting the request.

Updates to this Policy:

We will keep this policy updated in response to changes in data privacy law and any changes to our business. Please review this policy for updates.

Cookies:

We use cookies, pixels and tags (which we shall collectively define as “Cookies”) on our websites to personalise content and ads, to provide social media features and to analyse our traffic. We also share information about your use of our site with our social media, advertising and analytics partners who may combine it with other information that you’ve provided to them or that they’ve collected from your use of their services. You consent to our cookies if you continue to use our websites.