

## Privacy Policy

We take the privacy of our interims and clients very seriously. We ask that you read this privacy policy carefully as it contains important information about how we will use your personal data.

### Who are we?

Alium Partners and all its subsidiary companies including but not limited to:

Alium Partners are an interim and recruitment provider and trusted partner to leading businesses within the UK and around the world. We provide specialist talent, at pace.

Our specialist practice areas work closely with a select number of business in the IT, manufacturing, retail, public sector and utilities sectors.

### What does this policy cover?

This policy sets out the types of personal data that we collect and explains the following:

- How and why we collect, store, process and use your data
- How long we keep personal data for
- When, why and with whom we share your personal data
- The legal basis in which we may collect, store and process our personal data
- The implications associated with refusing to provide us with your personal data
- Your rights and choices surrounding your personal data
- How we may contact you and how you may contact us

### What personal data we may collect about you

We collect the information we need in order to find employment/interim opportunities on your behalf and to assess your eligibility throughout the different stages of the recruitment cycle. This information includes CVs, identification documents, educational records, work history, employment details, business plans and references.

We may also collect sensitive personal data about you in the form of gender or race. We only collect sensitive personal data where absolutely necessary. We will only collect this information from yourself and only after having been given your explicit consent.

If you are receiving coaching from us, we will also process any additional information that you chose to provide us with during that time.

We may monitor your usage of our website. This information helps us build a profile of our users. Some of this data will be aggregated or statistical, which means we will not be able to identify you individually – please see 'Use of Cookies' section below.

## Where do we collect personal data about you from?

The following are the sources from which we may collect personal data from:

- Directly from yourself. This is information that you will provide whilst searching for a new employment opportunity and/or during the different recruitment stages or during coaching
- From an agent/third party acting on your behalf e.g an interim management company
- Through publicly available sources such as:
  - Social media, such as LinkedIn
  - Company websites
  - Articles and marketing literature
- By referencing or word of mouth. For example, you may be recommended by a friend, a former employer, a former colleague or even a present employer
- Search databases such as job boards, where Alium Partners pays a monthly subscription to a job board such as Reed, Indeed etc. where you will have uploaded personal data

## How and why we may use your personal data

We use your personal data to match your skills, experience and education with those requires by a potential employer. We will initially collect basic information on you such as contact details, job role and experience and then pass this on to the client in search of personnel. We will always ask your permission (on each separate occasion) prior to sending your CV to prospective clients.

If you are chosen by the client and go through to the next stage of the recruitment process, we will then collect more information from you at the interview (or equivalent) stage and onwards, in that manner.

If you are receiving coaching from us, we use your personal data in order to understand more about you and to assist you with understanding your skills and areas for improvement for future opportunities and options.

## How long do we keep your personal data for?

We retain your information as follows:

- Candidate Data: Two years from the last point of contact, unless the candidate states that they do not wish to be contacted, in which case, this information is deleted (unnecessary and outdated data will be deleted before this)
- Interim Manager data: Two years from the last point of contact, unless the interim manager states that they do not wish to be contacted, in which case, this information is deleted (unnecessary and outdated data will be deleted before this)
- Client contact details: Two years from the end of the service contract from the last point of contact, subject to us having had no further contact with them during this time (unnecessary and outdated data will be deleted before this)

- Coached candidate data: Two years after the coaching has ceased (unnecessary and outdated data will be deleted before this)

### **Who do we share your personal data with?**

Your personal data may be shared with any client organization initiating a search for personnel. Publicly available data may be shared with any client organisation instructing us on a search. Please note, personal data will not be shared with any client unless we have been given explicit consent.

We may also conduct checks to verify the information that you have provided and where we do this, we may share your information with the client.

In order for us to store your information securely, your data is stored in our CRM system which can also be accessed by the managing company of this database. The CRM system we currently utilize is RDP ProNet, owned by Access Partnersip, whose privacy policy can be found within the following link <https://www.theaccessgroup.com/recruitment-software/privacy-and-legal/>

Where necessary we may pass data to third parties that help us to process data.

### **Where we store and process your personal data**

The data that we collect from you may/will be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may be transferred to third parties outside of the EEA for the purpose of our recruitment services. It may/will also be processed by staff operating outside the EEA who works for us or for one of our suppliers. This includes staff engaged in, among other things, our recruitment services and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is never 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; 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.

## What legal basis do we have for using your information?

For prospective candidates, interim managers, referees and clients, our processing is necessary for our legitimate business interests.

That is, we require this information in order to assess suitability for potential roles, to find potential candidates and to contact clients and referees.

If you are shortlisted as a candidate or are coached by Alium Partners, then this may involve processing more detailed personal data including sensitive data such as health information that you or others provide about you. In these cases we always ask for consent before undertaking such processing.

In the case of a client organization, we may also store, process and use data, such as contact details, in order to fulfil programmes of work we have been engaged to undertake.

## Our legitimate business interests

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, interim worker placements or independent professional contracts. The exchange of personal data of our candidates and our client contacts is a fundamental, essential part of this process.

In order 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. Such historical information, will be kept in line with the restrictions set out within this policy.

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 and other relevant notifications.

## Keeping your data secure

We will use technical and organizational measures to safeguard your personal data, for example:

- Our internal systems are secured from the Internet by the use of a CheckPoint perimeter firewall. This system is locked down to a high degree
- Additionally, our internal systems are all password protected, using complex passwords
- Desktop security is provided to us through the use of Trend OfficeScan software
- We also utilise MessageLabs security, meaning that all emails must first pass through

- MessageLabs anti-spam filters before entering the Alium network
- We protect internal data by regular nightly backups, and each server is imaged on a weekly basis.
- Whilst we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data which is transferred from you or to you via the internet.

### Use of cookies

We may obtain information about your online movements and use of the internet. We do this by placing a 'cookie', which is a small file, on your computer's hard disk. Cookies can be used for several reasons, including to recognize you when you visit this website and to store your personal preferences.

The vast majority of web browsers accept cookies. However, you can change your browser settings so that cookies are not accepted. If you do this you may lose some of the functionality of the website.

For further information about cookies and how to disable them please visit [www.aboutcookies.org](http://www.aboutcookies.org)

### Updating your personal data

Should you wish to update any personal data we may be holding about you, you can use our online facility in order to update / amend your CV.

### Your rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes and we will collect express consent from you if legally required prior to using your personal data for marketing purposes.

You can exercise your right to accept or prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at – Alium Partners Ltd, Becket House, 36 Old Jewry, EC2R 8DD.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

The GDPR provides you with the following rights to:

- Be informed in a clear, transparent and easily understandable way about how we use your information and your rights. We are using this document to inform you of this policy.
- Withdraw consent even after giving your consent previously. If you have given us consent do store your personal data and for what we do with this, you are within your rights to withdraw this at any stage (although if you do so, it does not imply that anything we have done with your data up until that point with your consent, is unlawful)
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party in certain formats, if practicable.
- Make a complaint to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link:  
<https://ico.org.uk/concerns>

### Access to information

The Data Protection Act 1998 and the GDPR give you the right to access information held about you. We also encourage you to contact us to ensure your data is accurate and complete. Your right of access can be exercised in accordance with the Act (and the GDPR once it is in force). A subject access request should be submitted to [GDPR@aliumpartners.com](mailto:GDPR@aliumpartners.com) No fee will apply once the GDPR comes into force.

### How we will contact you

We may contact you by phone, email or via social media. If you prefer a particular contact method then please let us know.

## Our contact details

We welcome your feedback and questions. If you wish to contact us, please send an email to [GDPR@aliumpartners.com](mailto:GDPR@aliumpartners.com). Alternatively, you can write to us at Gemini House, Hargreaves Road, Swindon, SN25 5AJ.

We may change this privacy policy from time to time. You should check this policy occasionally to ensure you are aware of the most recent version.