



## Privacy Policy

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### INTRODUCTION

This Privacy Policy explains what we do with your personal data, whether we are in the process of helping you find a job, continuing our relationship with you once we have found you a role, providing you with a service, receiving a service from you, using your data to ask for your assistance in relation to one of our Candidates, or you are visiting our website.

It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

This Privacy Policy applies to the personal data of our Website Users, Candidates, Clients, Suppliers, and other people whom we may contact in order to find out more about our Candidates or whom they indicate is an emergency contact. It also applies to the emergency contacts of our Staff. To be clear, if you are a member of Magnus Search Staff, you should refer to the Magnus Search's Staff Privacy Policy which is available on the Magnus Search intranet.

For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679), (the "GDPR"), the company responsible for your personal data ("Magnus Search " or "us").

It is important to point out that we may amend this Privacy Policy from time to time. Please just visit this page if you want to stay up to date, as we will post any changes on the website.

If you are dissatisfied with any aspect of our Privacy Policy, you may have legal rights and, where relevant, we have described these as well.

This Privacy Policy applies in relevant countries throughout our international network. Different countries may approach data privacy in slightly different ways and so we also have country-specific parts to this Privacy Policy. This allows us to ensure that we're complying with all applicable data privacy protections, no matter where you are.

### SHORT FORM "AT A GLANCE" SECTION

#### **What kind of personal data do we collect?**

**CANDIDATE DATA:** In order to provide the best possible employment opportunities that are tailored to you, we need to process certain information about you. We only ask for details that will genuinely help us to help you, such as your name, age, contact details, education details, employment history, emergency contacts, immigration status, financial information (where we need to carry out financial background checks), and social security number (and of course you may choose to share other relevant information with us). Where appropriate and in accordance with local laws and requirements, we may also collect information related to your health, diversity information or details of any criminal convictions. To the extent that you access our website we will also collect certain data from you.



**CLIENT DATA:** If you are a Magnus Search customer, we need to collect and use information about you, or individuals at your organisation, in the course of providing you services such as: (i) finding Candidates who are the right fit for you or your organisation; (ii) providing you with a Managed Service Provider (“MSP”) programme (or assisting another organisation to do so); (iii) providing you with Recruitment Process Outsourcing (“RPO”) services (or assisting another organisation to do so); and/or (iv) notifying you of content published by Magnus Search which is likely to be relevant and useful to you (for example our Skills Index). To the extent that you access our website we will also collect certain data from you.

**SUPPLIER DATA:** We need a small amount of information from our Suppliers to ensure that things run smoothly. We need contact details of relevant individuals at your organisation so that we can communicate with you. We also need other information such as your bank details so that we can pay for the services you provide (if this is part of the contractual arrangements between us). To the extent that you access our website we will also collect certain data from you.

**PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:** In order to provide Candidates with suitable employment opportunities safely and securely and to provide for every eventuality for them and our Staff, we need some basic background information. We only ask for very basic contact details, so that we can get in touch with you either for a reference or because you’ve been listed as an emergency contact for one of our Candidates or Staff members.

**WEBSITE USERS:** We collect a limited amount of data from our Website Users which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, and the times that our website is most popular. The number of elements of the personal data we collect from you are required to enable us to fulfil our contractual duties to you or to others. Where appropriate, some, for example Candidates’ social security number and, religious affiliation, are required by statute or other laws. Other items may simply be needed to ensure that our relationship can run smoothly. Depending on the type of personal data in question and the grounds on which we may be processing it, should you decline to provide us with such data, we may not be able to fulfil our contractual requirements or, in extreme cases, may not be able to continue with our relationship.

### **How do we collect your personal data?**

**CANDIDATE DATA:** There are two main ways in which we collect your personal data:

1. Directly from you; and
2. From third parties.

To the extent that you access our website or read or click on an email from us, we may also collect certain data automatically or through you providing it to us.

**CLIENT DATA:** There are two main ways in which we collect your personal data:

1. Directly from you; and
2. From third parties (e.g. our Candidates) and other limited sources (e.g. online and offline media).

To the extent that you access our website or read or click on an email from us, we may also collect certain data automatically or through you providing it to us.



**SUPPLIER DATA:** We collect your personal data during the course of our work with you.

To the extent that you access our website or read or click on an email from us, we may also collect certain data automatically or through you providing it to us.

**PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:** We collect your contact details only where a Candidate or a member of our Staff puts you down as their emergency contact or where a Candidate gives them to us in order for you to serve as a referee.

**WEBSITE USERS:** We collect your data automatically via cookies when you visit our website, in line with cookie settings in your browser. We will also collect data from you when you contact us via the website, for example by using the chat function.

### **How do we use your personal data?**

**CANDIDATE DATA:** The main reason for using your personal details is to help you find employment or other work roles that might be suitable for you. The more information we have about you, your skillset and your ambitions, the more bespoke we can make our service. Where appropriate and in accordance with local laws and requirements, we may also use your personal data for things like marketing, profiling and diversity monitoring. Where appropriate, we will seek your consent to undertake some of these activities.

**CLIENT DATA:** The main reason for using information about Clients is to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly. This may involve:

- (i) identifying Candidates who we think will be the right fit for you or your organisation;
- (ii) providing you with an MSP programme (or assisting another organisation to do so); and/or
- (iii) providing you with RPO services (or assisting another organisation to do so). The more information we have, the more bespoke we can make our service.

**SUPPLIER DATA:** The main reasons for using your personal data are to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly, and to comply with legal requirements.

### **PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:**

We use referees' personal data to help our Candidates find employment which is suited to them. If we are able to verify their details and qualifications, we can make sure that they are well matched with prospective employers. We may also use referees' personal data to contact them in relation to recruitment activities that may be of interest to them. We use the personal details of a Candidates or Staff member's emergency contacts in the case of an accident or emergency affecting that Candidates or member of Staff.

**WEBSITE USERS:** We use your data to help us to improve your experience of using our website, for example by analysing your recent job search criteria to help us to present jobs to you that we think you'll be interested in. If you are also a Candidate or Client of Magnus Search, we may use data from your use of our websites to enhance other aspects of our communications with, or service to, you.

Please note that communications to and from Magnus Search ' Staff including emails may be reviewed as part of internal or external investigations or litigation.



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

**CANDIDATE DATA:** We may share your personal data with various parties, in various ways and for various reasons. Primarily we will share your information with prospective employers to increase your chances of securing the job you want. Unless you specify otherwise, we may also share your information with any of our group companies and associated third parties such as our service providers where we feel this will help us to provide you with the best possible service.

**CLIENT DATA:** We will share your data: (i) primarily to ensure that we provide you with a suitable pool of Candidates; (ii) to provide you with an MSP programme (or assist another organisation to do so); and/or (iii) to provide you with RPO services (or assist another organisation to do so). Unless you specify otherwise, we may share your information with any of our group companies and associated third parties such as our service providers to help us meet these aims.

**SUPPLIER DATA:** Unless you specify otherwise, we may share your information with any of our group companies and associated third parties such as our service providers and organisations to whom we provide services.

### PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS

**REFEREES AND EMERGENCY CONTACTS:** Unless you specify otherwise, we may share your information with any of our group companies and associated third parties such as our service providers and organisations to whom we provide services.

**WEBSITE USERS:** Unless you specify otherwise, we may share your information with providers of web analytics services, marketing automation platforms and social media services to make sure any advertising you receive is targeted to you.

### How do we safeguard your personal data?

We care about protecting your information. That's why we put in place appropriate measures that are designed to prevent unauthorised access to, and misuse of, your personal data.

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

If we have not had meaningful contact with you (or, where appropriate, the company you are working for or with) for a period of two years, we will Delete your personal data from our systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation).

### How can you access, amend or take back the personal data that you have given to us?

Even if we already hold your personal data, you still have various rights in relation to it. To get in touch about these, please contact us. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

- **Right to object:** If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.
- **Right to withdraw consent:** Where we have obtained your consent to process your



personal data for certain activities (for example, for profiling your suitability for certain roles), or consent to market to you, you may withdraw your consent at any time.

- **Data Subject Access Requests (DSAR):** Just so it's clear, you have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or Delete such information. At this point we may comply with your request or, additionally do one of the following:
  - we may ask you to verify your identity, or ask for more information about your request; and
  - where we are legally permitted to do so, we may decline your request, but we will explain why if we do so.
- **Right to erasure:** In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to “erase” your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If we do agree to your request, we will Delete your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. That way, we will minimise the chances of you being contacted in the future where your data are collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.
- **Right of data portability:** If you wish, you have the right to transfer your data from us to another data controller. We will help with this – either by directly transferring your data for you, or by providing you with a copy in a commonly used machine readable format.
- **Right to lodge a complaint with a supervisory authority:** You also have the right to lodge a complaint with your local supervisory authority.

If your interests or requirements change, you can unsubscribe from part or all of our marketing content (for example job role emails or Magnus Search newsletters) by clicking the unsubscribe link in the email, or by updating your preferences through our preference centre on the Magnus Search website (by signing into your account or entering your email address). How do we store and transfer your data internationally?

Magnus Search is a global organisation – this is what enables us to offer the level of services that we do. In order for us to continue operating in this way, we may have to transfer or store your data internationally. Who is responsible for processing your personal data on the Magnus Search website?

Magnus Search controls the processing of personal data on its website(s).

### **What are cookies and how do we use them?**

A “cookie” is a bite-sized piece of data that is stored on your computer’s hard drive. They are used by nearly all websites and do not harm your system. We use them to track your activity to help ensure you get the smoothest possible experience when visiting our website. We can use the information from cookies to ensure we present you with options tailored to your preferences on your next visit. We can also use cookies to analyse traffic and for advertising purposes.

If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings. We also provide information about this in our Marketing preferences page on the Magnus Search website.

### **How to reject cookies**



If you don't want to receive cookies that are not strictly necessary to perform basic features of our site, you may choose to opt-out by changing your browser settings

Most web browsers will accept cookies but if you would rather we didn't collect data in this way you can choose to accept all or some or reject cookies in your browser's privacy settings. However, rejecting all cookies means that you may not be able to take full advantage of all our website's features. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

For more information generally on cookies, including how to disable them, please refer to [aboutcookies.org](http://aboutcookies.org). You will also find details on how to delete cookies from your computer.

## **LONG FORM DETAILED SECTIONS**

### **WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT?**

So you're looking for a bit more insight into what data we collect about you?

Here's a more detailed look at the information we may collect. The information described below is, of course, in addition to any personal data we are required by law to process in any given situation.

**CANDIDATE DATA:** Depending on the relevant circumstances and applicable local laws and requirements, we may collect some or all of the information listed below to enable us to offer you employment opportunities which are tailored to your circumstances and your interests. In some jurisdictions, we are restricted from processing some of the data outlined below. In such cases, we will not process the data in those jurisdictions:

Name;

Age/date of birth;

Birth number;

Sex/gender;

Photograph;

Marital status;

Contact details;

Education details;

Employment history;

Emergency contacts and details of any dependants;

Referee details;

Immigration status (whether you need a work permit);

Nationality/citizenship/place of birth;

A copy of your driving licence and/or passport/identity card;

Financial information (where we need to carry out financial background checks);

Social security number (or equivalent in your country) and any other tax-related information;





Diversity information including racial or ethnic origin, religious or other similar beliefs, and physical or mental health, including disability-related information;

Details of any criminal convictions if this is required for a role that you are interested in applying for;

Details about your current remuneration, pensions and benefits arrangements;

– Information on your interests and needs regarding future employment, both collected directly and inferred, for example from jobs viewed or articles read on our website;

Extra information that you choose to tell us;

Extra information that your referees choose to tell us about you;

Extra information that our Clients may tell us about you, or that we find from other third party sources such as job sites;

IP address;

The dates, times and frequency with which you access our services; and

CCTV footage if you attend our premises.

have your contact details or the details of individual contacts at your organisation (such as their names, telephone numbers and email addresses) to enable us to ensure that our relationship runs smoothly. We also hold information relating to your online engagement with Candidate profiles and other material published by Magnus Search, which we use to ensure that our marketing communications to you are relevant and timely. We may also hold extra information that someone in your organisation has chosen to tell us. In certain circumstances, such as when you engage with our Finance and Debt Recovery teams, our calls with you may be recorded, depending on the applicable local laws and requirements. If we need any additional personal data for any reason, we will let you know.

To the extent that you access our website we will also collect certain data from you. \*\*\*

#### **SUPPLIER DATA:**

We don't collect much data about Suppliers – we simply need to make sure that our relationship runs smoothly. We'll collect the details for our contacts within your organisation, such as names, telephone numbers and email addresses. We'll also collect bank details, so that we can pay you. We may also hold extra information that someone in your organisation has chosen to tell us. In certain circumstances, such as when you engage with our Finance and Debt Recovery teams, our calls with you may be recorded, depending on the applicable local laws and requirements.

To the extent that you access our website we will also collect certain data from you.

#### **PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:**

All we need from referees is confirmation of what you already know about our Candidate or prospective member of Staff, so that they can secure that job they really want. Emergency contact details give us somebody to call on in an emergency. To ask for a reference, we'll obviously need the referee's contact details (such as name, email address and telephone number). We'll also need these details if our Candidate or a member of our Staff has put you down as their emergency contact so that we can contact you in the event of an accident or an emergency. \*\*\*



**WEBSITE USERS** We collect a limited amount of data from our Website Users which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, your browser type, the location you view our website from, the language you choose to view it in and the times that our website is most popular. If you contact us via the website, for example by using the chat function, we will collect any information that you provide to us, for example your name and contact details.

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## **HOW DO WE COLLECT YOUR PERSONAL DATA?**

**CANDIDATE DATA:** We collect Candidate personal data in three primary ways: 1. Personal data that you, the Candidate, give to us; 2. Personal data that we receive from other sources; and 3. Personal data that we collect automatically. Personal data you give to us

Magnus Search needs to know certain information about you in order to provide a tailored service. This will enable us to provide you with the best opportunities and should save you time in not having to trawl through information about jobs and services that are not relevant to you.

There are numerous ways you can share your information with us. It all depends on what suits you. These may include:

- Entering your details on the Magnus Search website or via an application form, as part of the registration process;
- Leaving a hard copy CV at a Magnus Search recruitment event, job fair or office;
- Emailing your CV to a Magnus Search consultant or being interviewed by them;
- Applying for jobs through a job aggregator, which then redirects you to the Magnus Search website;
- Entering your personal details into a Magnus Search microsite; or
- Entering a competition through a social media channel such as Facebook or Twitter.
- Personal data we receive from other sources

We also receive personal data about Candidate from other sources. Depending on the relevant circumstances and applicable local laws and requirements, these may include personal data received in the following situations:

- Your referees may disclose personal information about you;
- Our Clients may share personal information about you with us;
- We may obtain information about you from searching for potential Candidate from third party sources, such as LinkedIn and other job sites;
- If you 'like' our page on Facebook or 'follow' us on Twitter we will receive your personal information from those sites; and
- If you were referred to us through an RPO or an MSP supplier, they may share personal information about you with us.

Personal data we collect automatically:

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us.





## CLIENT DATA

We collect Client personal data in three ways:

1. Personal data that we receive directly from you;
2. Personal data that we receive from other sources; and
3. Personal data that we collect automatically.

Personal data that we receive directly from you

- We both share the same goal – to make sure that you have the best staff for your organisation. We will receive data directly from you in two ways:
  - Where you contact us proactively, usually by phone or email; and/or
  - Where we contact you, either by phone or email, or through our consultants' business development activities more generally.

Personal data we receive from other sources:

Where appropriate and in accordance with any local laws and requirements, we may seek more information about you or your colleagues from other sources generally by way of due diligence or other market intelligence including:

- From third party market research and by analysing online and offline media (which we may do ourselves, or employ other organisations to do for us);
- From delegate lists at relevant events; and
- From other limited sources and third parties (for example from our Candidates to the extent that they provide us with your details to act as a referee for them).

Personal data we collect via our website:

- To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us.

**WEBSITE USERS:** When you visit our website, there is certain information that we may automatically collect, whether or not you decide to use our services. This includes your IP address, the date and the times and frequency with which you access the website and the way you browse its content. We will also collect data from you when you contact us via the website, for example by using the chat function.

- We collect your data automatically via cookies, in line with cookie settings in your browser. If you are also a Candidate or Client of Magnus Search, we may use data from your use of our websites to enhance other aspects of our communications with or service to you.

## HOW DO WE USE YOUR PERSONAL DATA?

Having obtained data about you, we then use it in a number of ways.

- **CANDIDATE DATA:** We generally use Candidate data in four ways:
  - Recruitment Activities;
  - Marketing Activities;
  - Equal Opportunities Monitoring; and
  - To help us to establish, exercise or defend legal claims.
- In appropriate circumstances in the future, we may also use Candidate data for Profiling.

Here are some more details about each:

Recruitment Activities

- Obviously, our main area of work is recruitment – connecting the right Candidates with the right jobs. We've listed below various ways in which we may use and process your personal data for this purpose, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive.