

Knowit's Privacy Notice

We ask that you read this privacy notice carefully as it contains important information about who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

Who we are

We are Knowit Recruitment Limited (trading simply under Knowit). Knowit collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the [General Data Protection Regulation](#) which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws.

For our operations in the United States of America, our appointed representative in the European Economic Area (EEA) is Knowit's UK entity, Knowit Recruitment Limited.

The personal information we collect and use

Information collected by us

In the course of our activities as a recruitment and staffing specialist, we collect different kinds of information depending on whether you are a **job seeker** wishing to utilise our recruitment services to find your dream job, or whether you are a **client** who has contacted us to help you to find your next star employee. When we refer to clients in this policy, we also refer to our commercial business suppliers, partners and vendors.

For our **clients**, we store the following personal information when you provide it to us:

Your name, your job title and role within your organisation, your office or head office address, your professional contact details (such as telephone numbers, fax numbers and email addresses).

For our **candidates**, we have set out a table at the **Schedule** below which sets out the information collected by us or from third parties. As an indication, we store the following information when you provide it to us may include:

Your name and contact details (i.e. address, home and mobile phone numbers, email address); Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests; Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs; Information regarding your criminal record; Details of your referees; Information about your previous academic and/or employment history; from references obtained about you from previous employers and/or education providers; Information regarding your academic and professional qualifications; Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information; A copy of your driving licence.

Information collected from other sources

In general, we do not generally obtain personal information from our **clients** from other sources, but this can occur on occasion, such as:

- From professional social media sites where such information is in the public domain.
- From any professional marketing materials or other publications (including your company's website) which have been issued and maintained by your company.

- From information that may have been gained or exchanged from trade fairs, industry talks or networking forums.
- From your company itself, where we have initially been dealing with another department or another group entity.

In respect of our **candidates**, sometimes we will collect information from third parties such as previous employers, your school, university or college, professional regulators or government bodies based on information that has been provided by the candidates themselves. More information about this is set out in the Schedule below, but here are examples of some of the categories of information collected and organisations who might provide us with that information:

- Your previous academic institution and/or employers.
- Government authorities such as the the Disclosure and Barring Service (DBS) (providing information regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates (ECRCs)), or from the Home Office regarding your nationality and immigration status.
- Professional bodies or regulators regarding your professional qualifications or certifications.

On some occasions, we obtain information about candidates from third parties, such as from Job Boards with which the candidates may be registered, or from publically available, professional networking sites.

In this case, if one of our candidates uploads their CV to a jobs board website and we consider that the candidate may have the skills that our clients are looking for we might decide to collect that candidate's information in order to pass the CV to those companies.

Similarly, if a candidate creates a profile on a social networking website designed specifically for professional networking and selects a specific option to let recruiters like us know that the candidate is open to job opportunities, then we may use their contact details as published on that website, for recruitment purposes.

How we use your personal information

In respect of our **clients**, we use any information we collect about you to:

- Best provide our recruitment services, tailor-made to suit the needs of our respective businesses;
- To contact you in order to provide our recruitment services;
- To negotiate and enter into a commercial agreement with you which governs the provision of our recruitment services to you and sets out yours (and our) rights and obligations, such as dealing with payment, and sending related correspondence.

In respect of our **candidates**, we have set out a handy table at the Schedule below which sets out how we use your information in order to provide you with the highest quality recruitment services.

Who we share your personal information with

Typically, for our **candidates**, the types of organisations with whom we share your information include our clients, who are seeking individuals with a profile similar to yours in order to offer employment opportunities.

This data sharing enables us to best help you in your job search, and also allows us to fulfil our sourcing obligations to our clients.

However, candidates, please rest assured! We are proud to take our data protection obligations seriously and will not share your personal information with any other third party, unless we have your express consent to do so. Please rest assured that we are committed to providing high quality recruitment services and will never forward on your CV without first having obtained your consent.

Similarly, we share **client** data with our candidates when we think that we have found a good fit. This data is limited to information about the role, the company, any specific requirements or details. If the candidate is

offered an interview with you, we will also provide the candidate with the hiring manager's name, professional contact details and office address. Again, we will only ever share such information provided that our client contact has confirmed to us that we can do so, and that they are happy to meet with the candidate.

We might also share data pursuant to data processing agreements, such as on external IT servers or on cloud-based storage. We might also give your details to our third-party providers, such as external finance, external marketing managers or external lawyers to make sure that we are able to complete our contractual obligations to you, or indeed for the smooth running of our business in the event that we do not have an adequate back-office or administration support system internally. In any case, we always make sure that we have appropriate technical, security and organisational methods in place to secure the confidentiality and proper processing of your data, and we require that our third-party providers adhere to these guarantees too.

On occasion, some of those third-party recipients may be based outside the European Economic Area — for further information including on how we safeguard your personal data when this occurs, see 'Transfer of your information out of the EEA'.

We will also share candidate and client information with law enforcement or other government or official authorities, and our external lawyers, if required by applicable law or in pursuit or defence of a claim.

Whether information has to be provided by you, and if so why

The provision of details sent to us by our **clients**, such as the name, job title and professional contact details of the hiring manager, or account manager, as well as the appropriate office address (for billing or interview purposes) is required from our clients to enable us to ensure the proper administration of our services to you, to prepare the terms of business, to enter into a contract, to respect billing and payment procedures, to fulfil our general obligations to you (for example, by discussing your needs, requirements and providing you with our recruitment expertise), and administer the contract generally.

In respect of our **candidates**, in the table set out in the Schedule below we have explained how and when we are required to seek certain information from you as part of the recruitment process, either by law, or pursuant to contractual obligations with our clients, and once we are at the final selection stage, to ensure that the client has all of the relevant information at their disposal to be able to properly hire you.

How long your personal information will be kept

In respect of our clients:

We will hold any personal data about our **client** contacts for no longer than is reasonable in order to carry out our recruitment services pursuant to the intended conclusion of a contract, during the performance of the contract, and after its termination (for example, keeping any data in accordance with legal or fiscal obligations to in pursuit or defence of a claim). It may be that some personal data is retained on these documents, but this is purely incidental to documents which are generally required strictly for commercial purposes. Where possible, we will ensure that any personal data is anonymised where it is not strictly necessary.

As a general rule, we will keep all client contacts on file for a period of 4 years following our last meaningful contact with you, unless you expressly tell us otherwise, and before we delete your data we will always periodically check with you to see whether our recruitment services are still of interest, unless you tell us otherwise.

In respect of our candidates:

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful and whether you become employed by one of our clients, the nature of the information concerned and the purposes for which it is processed.

Generally, we will keep recruitment information (including interview notes) for 2 years following our last meaningful contact with you, but before we delete your personal data, we will check with you to see whether you still want us to keep your details on file should you wish to use our services for your future job hunt.

Sometimes we may hold some data for longer than this, taking into account the limitation periods for potential legal or contractual claims. For example, if your application is successful, we will keep only the recruitment information that is necessary in relation to your employment with the client and pursuant to our contractual obligations with them.

In all cases, when checking with **clients** and **candidates** as to whether you still want to remain on our data base, and for all other direct marketing activities we carry out, we always respect the rules surrounding electronic communications and the use of new technologies (such as information gathered by cookies) and security breaches pursuant to the Privacy and Electronic Communications (EC Directive) Regulations 2003 (also known as "PECR"). In this case, we will always ask you at the outset and will always provide you with the possibility to opt-in and opt-out.

Reasons we can collect and use your personal information

As far as our **clients** are concerned, we process your personal information (i) with a view to entering into a commercial contract or to perform that commercial contract; (ii) in accordance with our legal obligations (for example, our accounting and HMRC obligations); and (iii) in our mutual legitimate interests – we both have the same or similar legitimate interests in collaborating together – to make sure we can secure you top talent!

In respect of our **candidates**, the table at the Schedule below sets out the reasons we can collect and use your personal information. We have nonetheless provided a couple of scenarios below which we hope are helpful, and which also complement the information in the table.

In the event that a candidate has posted their CV on a job board, the Information Commissioner (the UK Data Protection Authority, also known as the ICO) considers in its guidance that it is likely in this situation that the lawful basis for processing for the recruitment agency and their clients is legitimate interests. We agree with this approach.

In this instance, the candidate has made their CV available on a job board website for the express reason of employers and recruiters being able to access this data. They have not given specific consent for identified 'data controllers', but they would clearly expect that recruitment agencies, such as us, would access the CV and share it with our clients, indeed, this is likely to be the candidate's intention.

As such, we consider that our legitimate interests as a recruitment agency and those of our clients to fill vacancies are not overridden by any interests or rights of the candidate. In fact, in this instance, our legitimate interests are likely to align with the interests of the candidate in circulating their CV in order to find a job.

In respect of a candidate's social media account, we also agree with the ICO, that when a candidate has selected an "Available for Work Option" or "Please Notify Recruiters", the candidate would clearly expect those who view their profile might use their contact details for recruitment purposes, which means that again, our legitimate interests are likely to align with the interests of the candidate in their search for a job.

In any case, and as we mentioned above, any contact we make with candidates via job boards or social media is always carried out in compliance with the GDPR and other legal requirements (such as the ["PECR"](#)) which govern how we can contact you by electronic means or by using new technologies.

We also understand that if a candidate has not selected the "Available for Work Option", or similar, then even if that candidate has the most fantastic profile for one of our clients, we will never assume that there is an expectation to be contacted for work and we consider that the interests of such potential candidates in maintaining control over their data overrides any of our legitimate interests as a recruitment agency or recruiting organisation. In this instance, we would always seek the individual's consent and ensure that they confirm they are happy to collaborate with us before any information is taken from their profile. As far as we are con-

cerned, this approach means that we can supply the best quality candidates to our clients and provide excellent recruitment services in the process.

Transfer of your information out of the EEA

For both **clients** and **candidates**, we may transfer your personal information to locations outside the European Economic Area (EEA), for example, for storage on servers based outside of the EEA.

Sometimes, countries outside of the EEA do not have the same data protection laws as the United Kingdom and the EEA. Therefore, if we do transfer your personal information outside of the EEA, we will always ensure that appropriate or suitable relevant safeguards, such as the Standard Contractual Clauses, or as otherwise specified in the [General Data Protection Regulation](#) are applied, in order to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal information.

If you would like further information, please contact us (see 'How to contact us' below). We will not otherwise transfer your personal data outside of the EEA or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

Your rights

Under the [General Data Protection Regulation](#) you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your personal information
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email, call or write to us
- let us have enough information to identify you
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates.

If you would like to unsubscribe from any emails you receive from us, you can also click on the 'unsubscribe' button at the bottom of the email. It may take up to 7 days for this to take place.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or by telephone: 0303 123 1113.

Changes to this privacy notice

This privacy notice was published on *25th May 2018* and last updated on *25th May 2018*.

We may change this privacy notice from time to time, when we do we will inform you via the email address that we hold on file for you.

How to contact us

Please contact us if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us, please send an email to dataprotection@knowit.co.uk, write to *Knowit Recruitment, 9 Great Newport Street, London, WC2H 7JA* marking your correspondence for the attention of our **Data Protection Officer** or call *020 3693 9000*.

Do you need extra help?

If you would like this notice in another format (for example: audio, large print, braille) please contact us (see 'How to contact us' above).

ABOUT THE INFORMATION WE COLLECT AND HOLD REGARDING CANDIDATES

Part A

Up to and including the shortlisting stage

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name and contact details (ie address, home and mobile phone numbers, email address)	From you	<p>Consent: to carry out a fair recruitment process</p> <p>Consent: to progress your application, arrange interviews and inform you of the outcome at all stages</p>	<p>To enable your dedicated recruitment consultant to contact you to progress your application, arrange interviews and inform you of the outcome</p> <p>To inform the relevant hiring manager at the client of your application</p>
Details of your qualifications, experience, employment history (including job titles, salary, working hours) and interests	From you, in the completed application form and interview notes (if relevant)	<p>Consent: to carry out a fair recruitment process</p> <p>Consent: to make an informed decision to shortlist for interview and (if relevant) to recruit</p>	<p>To make an informed recruitment decision about whether your profile is suitable for our client's needs</p> <p>The person making the shortlisting decision will receive pseudonymised or anonymised details only; if you are invited for interview, the interviewer will receive non-anonymised details</p>
Your name, contact details and details of your qualifications, experience, employment history and interests	From you, in the completed application form and interview notes (if relevant)	<p>Consent: to carry out a fair recruitment process</p> <p>Consent: if you are unsuccessful in your application, we will ask if wish for your details may be passed on to another one of our clients to see if they have any suitable vacancies</p>	To see whether any of our clients has any suitable vacancies
Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs	From you, in a completed anonymised equal opportunities monitoring form	Consent, but also to comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)	To comply with our equal opportunities monitoring obligations and to follow our equality and other policies and ensure that our clients are able to do the same.

			For further information, see * below
Information regarding your criminal record	From you, in your completed application form	Consent, but also to comply with our legal obligations	To make an informed recruitment decision, and to allow our clients to do the same To carry out statutory checks Information shared with DBS and other regulatory authorities as required For further information, see * below
Details of your referees	From your completed application form	Consent: to carry out a fair recruitment process and ensure that your profile is a good match for our client needs Consent: in the regulated sector, to comply with our legal obligations to obtain regulatory references	To carry out a fair recruitment process and ensure that your profile is a good match for our client needs. To comply with legal/regulatory obligations Information shared with relevant recruitment consultants, the client and the referee

Part B

Before our clients make a final decision to recruit

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers <input type="checkbox"/>	From your referees (details of whom you will have provided)	Consent: to make an informed decision to recruit and to ensure that our client is able to do the same Consent: to allow our clients to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To obtain the relevant reference about you To comply with legal/regulatory obligations and our contractual obligations towards our clients. Information shared with relevant managers and HR personnel (including our recruitment consultants and individuals at

			our client)
Information regarding your academic and professional qualifications <input type="checkbox"/>	From you, from your education provider, from the relevant professional body	Consent and also pursuant to our legitimate interest: to verify the qualifications information provided by you and to ensure that our clients are able to do the same.	To make an informed recruitment decision, and ensure that your profile suits our client needs
Information regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates (ECRCs) <input type="checkbox"/>	From you and from the Disclosure and Barring Service (DBS)	To comply with our legal obligations and obligations towards our client. Legitimate interest: to verify the criminal records information provided by you	To make an informed recruitment decision and allow our clients to do the same To carry out statutory checks Information shared with DBS and other regulatory authorities as required For further information, see * below
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information <input type="checkbox"/>	From you and, where necessary, the Home Office	To comply with our legal obligations Consent: to comply with our contractual obligations towards our client and also to ensure our client is able to maintain employment records in the event that you are hired by them	To carry out right to work checks Information may be shared with the Home Office
A copy of your driving licence <input type="checkbox"/>	From you	Consent: to verify your identity allowing our client to make an informed choice about their recruitment decision, and also to verify whether you have a valid licence (in the event this is a recruitment criterion from one of our clients).	To make an informed recruitment decision and enable our client to do the same

When you apply for a position in the United Kingdom, or enter into an employment contract with our clients, you are required to provide the categories of information marked '☐'. This helps our clients to verify your right to work and check your suitability for the position or enables us to do so when the client has specifically requested that we do this on their behalf.

* Further details on how we handle sensitive personal information and information relating to criminal convictions and offences are set out in our internal policies, copies of which are available by contacting: dataprotection@knowit.co.uk