



GDPR POLICY

DETAILED

What personal information do we collect?

Candidate data

In addition to any personal information we are required to collect in accordance to employment we may also collect some or all of the information listed below, please note that the below list of categories of personal data we may collect is not exhaustive.

- Name;*
- Age/date of birth;*
- Sex/gender;*
- Photograph;*
- Marital status;*
- Contact details;*
- Education details;*
- Employment history;*
- Emergency contacts and details of any dependents;*
- Referee details;*
- Immigration status;*
- 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 chooses 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;
- Telephone call recordings
- The dates, times and frequency with which you access our services; and
- CCTV footage if you attend our premises.

Client Data

The data we collect about Clients is actually very limited. We generally only need to 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 is efficient. We also hold information relating to your online engagement with Candidate profiles and other material published by Optus Healthcare, 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.

Supplier Data

We don't collect much data about Suppliers – we simply need to make sure that our relationship works efficiently. 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.

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 where available, we will collect any information that you provide to us, for example your name and contact details.

How do we collect your personal data?

Candidate Data

Personal data you give to us

Optus Healthcare needs to know certain information about you to provide our services. 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 Optus Healthcare websites or via an application form, as part of the registration process;
- Leaving a hard copy CV at a Optus Healthcare recruitment event, job fair or office;
- Emailing your CV to a Optus Healthcare consultant or being interviewed by them;
- Applying for jobs through a job aggregator or job board, which then redirects you to the Optus Healthcare website;
- Entering your personal details into a Optus Healthcare 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 a managed service provider or other agency, 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

Personal data you give to us

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
- 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



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
- 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).

Website Users

When you visit our website, there is certain information that we may automatically collect, whether you decide to use our services or not. 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 Optus Healthcare, 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 information?



Having obtained data about you, we then use in the following ways;

Candidate Data

Recruitment

Our main area of business 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.

- Collecting your data from you and other sources, such as social media or job sites.*
- Storing your details (and updating them when necessary) on our databases, so that we can contact you in relation to recruitment.*
- Providing you with our recruitment services and to facilitate the recruitment process.*
- Assessing data about you against vacancies which we think may be suitable for you.*
- Sending your information to Clients, in order to apply for jobs or to assess your eligibility for jobs.*
- Enabling you to submit your CV, apply online for jobs or to subscribe to alerts about jobs we think may be of interest to you.*
- Allowing you to participate in specialist online training.*
- Allowing you to participate in the interactive features of our services, when you choose to do so.*



- Carrying out our obligations arising from any contracts entered into between us.
- Carrying out our obligations arising from any contracts entered into between Optus Healthcare or subsidiary companies and third parties in relation to your recruitment.
- Facilitating our payroll and invoicing processes.
- Carrying out customer satisfaction surveys.
- Verifying details you have provided, or to request information (such as references, qualifications and potentially any criminal convictions)
- Complying with our legal obligations in connection with the detection of crime or the collection of taxes or duties.

Marketing

We may periodically send you information that we think you may find interesting, or to ask for your help with connecting other Candidates with jobs. We may wish to use your data for the purposes listed below, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive.

- enable us to develop and market other products and services;
- market our full range of recruitment services (permanent, temporary, contract) to you;
- send you details of reports, promotions, offers, networking and client events, and general information about the



industry sectors which we think might be of interest to you;

- provide you with information about certain discounts and offers that you are eligible for by virtue of your relationship with Optus Healthcare.

All our marketing is based on what we think will serve our Clients and Candidates best, but we know we won't always get it right for everyone. We may use your data to show you Optus Healthcare Limited adverts and other content on other websites, for example Facebook. If you do not want us to use your data in this way, please turn off the "Advertising Cookies" option (please refer to our Cookies Policy). Even where you have turned off advertising cookies, it is still possible that you may see a Optus Healthcare Limited advert, but in this case it won't have been targeted at you personally, but rather at an anonymous audience.

To establish, exercise or defend legal claims

In some circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

Client Data:

We use Client information for

Recruitment

- Storing your details (and updating them when necessary) on our databases, so that we can contact you in relation to recruitment activities;



- Keeping records of our conversations and meetings, so that we can provide targeted services to you.
- Undertaking customer satisfaction surveys.
- Processing your data to targeting appropriate marketing campaigns.

We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests.

Marketing

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- enable us to develop and market other products and services;
- market our full range of recruitment services (permanent, temporary, contract) to you;
- send you details of reports, promotions, offers, networking and client events, and general information about the industry sectors which we think might be of interest to you;
- provide you with information about certain discounts and offers that you are eligible for by virtue of your relationship with Optus Healthcare.



If you are not happy about this, you have the right to opt out of receiving marketing materials from us and can find out more about how to do so [here](#).

To help us to establish, exercise or defend legal claims

In some circumstances we may use your personal data to help us to establish, exercise or defend legal claims.

Supplier Data

We use supplier data in the following ways

- To store (and update when necessary) your details on our database, so that we can contact you in relation to our agreements;
- To offer services to you or to obtain support and services from you;
- To perform certain legal obligations;
- To help us to target appropriate marketing campaigns;
- and
- In more unusual circumstances, to help us to establish, exercise or defend legal claims

People whose data we receive from Candidates and Staff

- If our Candidates or Staff members put you down on our form as an emergency contact, we'll contact you in the case of an accident or emergency affecting them.
- If you were put down by our Candidate or a prospective member of Staff as a referee, we will contact you in order



to take up a reference. This is an important part of our Candidate quality assurance process, and could be the difference between the candidate being accepted for a role or not.

- If you were put down by our Candidate or a prospective member of Staff as a referee, we may sometimes use your details to contact you in relation to recruitment activities that we think may be of interest to you, in which case we will use your data for the same purposes for which we use the data of Clients.

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 or Candidates to you that we think you'll be interested in.

If you would like to find out more about cookies, including how we use them and what choices are available to you, please [click here](#).

Who do we share your personal data with?

We may share your personal data, in various ways and for various reasons, with the following categories of people:

- Any of our group companies;
- Individuals and organisations who hold information related to your reference or application to work with us, such as current, past or prospective employers, educators and

- examining bodies and employment and recruitment agencies;
- Tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this data (for example, because of a request by a tax authority or in connection with any anticipated litigation);
 - Third party service providers who perform functions on our behalf (including external consultants, business associates and professional advisers such as lawyers, auditors and accountants, technical support functions and IT consultants carrying out testing and development work on our business technology systems);
 - Third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place;
 - Marketing technology platforms and suppliers;
 - In the case of Candidates: potential employers and other recruitment agencies/organisations to increase your chances of finding employment;
 - In the case of Candidates: third party partners, job boards and job aggregators where we consider this will improve the chances of finding you the right job;
 - In the case of Candidates: MSP suppliers as part of our clients' MSP programmes;
 - In the case of Candidates Candidates and prospective members of Staff's referees: third parties who we have retained to provide services such as reference, qualification



and criminal convictions checks, to the extent that these checks are appropriate and in accordance with local laws;

- If Optus Healthcare Limited merges with or is acquired by another business or company in the future, (or is in meaningful discussions about such a possibility) we may share your personal data with the (prospective) new owners of the business or company.

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How do we protect your personal data?

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures. These include measures to deal with any suspected data breach.

If you suspect any misuse or loss of or unauthorised access to your personal information, please let us know immediately. Details of how to contact us can be found [here](#).

How long do we keep your Data?

How long do we keep your Data?



We will Delete your personal data from our systems if we have not had any meaningful contact with you (or, where appropriate, the company you are working for or with) for two years (or for such longer period as we believe in good faith that the law or relevant regulators require us to preserve your data). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected.

For those Candidates whose services are provided via a third party company or other entity, "meaningful contact" with you means meaningful contact with the company or entity which supplies your services. Where we are notified by such company or entity that it no longer has that relationship with you, we will retain your data for no longer than two years from that point or, if later, for the period of two years from the point we subsequently have meaningful contact directly with you.

When we refer to "meaningful contact", we mean, for example, communication between us (either electronic, verbal or written), or where you are actively engaging with our online services. If you are a Candidate we will consider there to be meaningful contact with you if you submit your updated CV onto our website or take part in any of our online training. We will also consider it meaningful contact if you communicate with us about potential roles, either by verbal or written communication or click through from any of our marketing communications. Your receipt, opening or reading of an email or other digital message from us will not count as meaningful contact – this will only occur in cases where you click-through or reply directly.

- The Company will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time.
- The Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services.
- We must also keep your payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation.
- Where the Company has obtained your consent to process your personal data, we will do so in line with our retention policy. Upon expiry of that period the Company will seek further consent from you. Where consent is not granted the Company will cease to process your data, where not in conflict with local laws and regulations.

How can you access, amend or take back the Personal Data that you have given to us?

One of the Data Protection Act 2018's main objectives is to protect and clarify the rights of EU citizens and individuals in the EU with regards to data privacy. This means that you retain various rights in respect of your data, even once you have given it to us. These are described in more detail below.



To get in touch about these rights, please [contact us](#). We will seek to deal with your request without undue delay, and in any event within 30 days (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues which you raise.

Your Rights

Right to object

This right enables you to object to us processing your personal data where we do so for one of the following reasons

- legitimate interests (of Optus Healthcare)
- to send you direct marketing materials

If your objection relates to us processing your personal data because we deem it necessary for your legitimate interests, we must act on your objection by ceasing the activity in question unless:

- we can show that we have compelling legitimate grounds for processing which overrides your interests; or
- we are processing your data for the establishment, exercise or defence of a legal claim.

If your objection relates to direct marketing, we must act on your objection by ceasing this activity.

Right to withdraw consent



Where we have obtained your consent to process your personal data for certain activities (for example, for our marketing arrangements or automatic profiling), you may withdraw this consent at any time and we will cease to carry out the particular activity that you previously consented to unless we consider that there is an alternative reason to justify our continued processing of your data for this purpose in which case we will inform you of this condition.

Right to Access

You may ask us to confirm what information we hold about you at any time, and request us to modify, update or Delete such information, this is also known as a Subject Access Request. We may ask you to verify your identity and for more information about your request. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is "manifestly unfounded or excessive". If you request further copies of this information from us, we may charge you a reasonable administrative cost where legally permissible. Where we are legally permitted to do so, we may refuse your request. If we refuse your request we will always tell you the reasons for doing so.

Under the Data Protection Act 2018 Subject Access Requests will be completed within one calendar month, unless the request is complex, or we have received multiple requests from the same data subject.



Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding data subject access requests and may refuse your request in accordance with such laws.

Right to erasure

You have the right to request that we erase your personal data in certain circumstances. Normally, the information must meet one of the following criteria:

- *the data is no longer necessary for the purpose for which we originally collected and/or processed them;*
- *where previously given, you have withdrawn your consent to us processing your data, and there is no other valid reason for us to continue processing;*
- *the data has been processed unlawfully (i.e. in a manner which does not comply with the Data Protection Act 2018);*
- *it is necessary for the data to be erased for us to comply with our legal obligations as a data controller;*
- *If we process the data because we believe it necessary to do so for our legitimate interests, you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.*

We would only be entitled to refuse to comply with your request for one of the following reasons:

- to exercise the right of freedom of expression and information;
- to comply with legal obligations or for the performance of a public interest task or exercise of official authority
- for public health reasons in the public interest
- for archival, research or statistical purposes
- to exercise or defend a legal claim

When complying with a valid request for the erasure of data we will take all reasonably practicable steps to delete the relevant data.

Right to restrict processing

You have the right to request that we restrict our processing of your personal data in certain circumstances. This means that we can only continue to store your data and will not be able to carry out any further processing activities with it until either: (i) one of the circumstances listed below is resolved; (ii) you consent; or (iii) further processing is necessary for either the establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of important EU or Member State public interest.

The circumstances in which you are entitled to request that we restrict the processing of your personal data are:

- where you dispute the accuracy of the personal data that we are processing about you. In this case, our processing of



- your personal data will be restricted for the period during which the accuracy of the data is verified;
- where you object to our processing of your personal data for our legitimate interests. Here, you can request that the data be restricted while we verify our grounds for processing your personal data;
 - where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it; and
 - where we have no further need to process your personal data but you require the data to establish, exercise, or defend legal claims.

If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.

Right to rectification

You also have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. Where appropriate, we will also tell you which third parties we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.



Right of data portability

If you wish, you have the right to transfer your personal data between data controllers. In effect, this means that you can transfer data you have supplied to Optus Healthcare Limited another Recruitment Company. To allow you to do so, we will provide you with your data in a commonly used machine-readable format that is password-protected so that you can transfer the data to another online platform. Alternatively, we may directly transfer the data for you. This right of data portability applies to: (i) personal data that we process automatically (i.e. without any human intervention); (ii) personal data provided by you; and (iii) personal data that we process based on your consent or in order to fulfil a contract.

Right to lodge a complaint with a supervisory authority

You also have the right to lodge a complaint with your local supervisory authority. Details of how to contact them can be found [here](#).

If you would like to exercise any of these rights, or withdraw your consent to the processing of your personal data (where consent is our legal basis for processing your personal data), details of how to contact us can be found [here](#). Please note that we may keep a record of your communications to help us resolve any issues which you raise.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal



information changes during the period for which we hold your data.

How do we store and transfer data internationally?

In order to provide you with the best service and to carry out the purposes described in this Privacy Notice, your data may be transferred:

- Between and within Optus Healthcare Limited entities; between and within Optus Healthcare Limited Companies;*
- to third parties (such as advisers or other Suppliers to the Optus Healthcare Limited business); to third parties (such as advisers or other Suppliers to the Optus Healthcare Limited business).*
- to overseas Clients;*
- to Clients within your country who may, in turn, transfer your data internationally;*
- to a cloud-based storage provider.*

We want to make sure that your data are stored and transferred in a way which is secure. We will therefore only transfer data outside of the European Economic Area or EEA (i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein) where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, for example:

- by way of data transfer agreement, incorporating the current standard contractual clauses adopted by the*



- European Commission for the transfer of personal data by data controllers in the EEA to data controllers and processors in jurisdictions without adequate data protection laws.
- by signing up to the EU-U.S. Privacy Shield Framework for the transfer of personal data from entities in the EU to entities in the United States of America or any equivalent agreement in respect of other jurisdictions.
 - transferring your data to a country where there has been a finding of adequacy by the European Commission in respect of that country's levels of data protection via its legislation; or
 - where it is necessary for the conclusion or performance of a contract between ourselves and a third party and the transfer is in your interests for the purposes of that contract (for example, if we need to transfer data outside the EEA in order to meet our obligations under that contract if you are a Client of ours).
 - where you have consented to the data transfer.

To ensure that your personal information receives an adequate level of protection, we have put in place appropriate procedures with the third parties we share your personal data with to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the law on data protection.

Cookies Policy



What's a cookie?

A "cookie" is a piece of information that is stored on your computer's hard drive and which records your navigation of a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes.

Cookies are used by nearly all websites and do not harm your system. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.

How do we use cookies?

We use cookies for the following reasons;

- To track your use of our website. This enables us to understand how you use the site and track any patterns that emerge individually or from larger groups. This helps us to develop and improve our website and services in response to what our visitors want and need*
- To help us advertise jobs to you that we think you'll be interested in. Hopefully this means less time for you trawling through endless pages and will get you into the employment you want more quickly.*

Cookies are either:

Session cookies: these are only stored on your computer during your web session and are automatically deleted when you close



your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any information from your computer.

Persistent cookies: a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again. We use persistent cookies for Google Analytics and for personalisation.

Cookies can also be categorised as follows:

Strictly necessary cookies

These cookies are essential to enable you to use the website effectively, such as when applying for a job, and therefore cannot be turned off. Without these cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.

Performance cookies

These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.

Functionality cookies: These cookies allow our website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the



services you use. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customise. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymised.

Personalisation cookies

These cookies help us to advertise details of potential job opportunities that we think may be of interest. These cookies are persistent (for as long as you are registered with us) and mean that when you log in or return to the website, you may see advertising for jobs that are similar to jobs that you have previously browsed.

What Legal Basis do we use for processing your data

Legitimate Interest

Article 6(1)(f) of the Data Protection Act 2018 is the one that is relevant here – it says that we can process your data where it "is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data."

Consent

In certain circumstances, we are required to obtain your consent to the processing of your personal data in relation to certain



activities. Depending on exactly what we are doing with your information, this consent will be opt-in consent or soft opt-in consent.

Article 4(11) of the Data Protection Act 2018 states that (opt-in) consent is "any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her." In plain language, this means that.

- You have to give us your consent freely, without us putting you under any type of pressure.
- You have to know what you are consenting to – so we'll make sure we give you enough information.
- You should have control over which processing activities you consent to and which you don't. We provide these finer controls within our privacy preference centre.
- You need to take positive and affirmative action in giving us your consent – we're likely to provide a tick box for you to check so that this requirement is met in a clear and unambiguous fashion.
- We will keep records of the consents that you have given in this way

In some cases, we will be able to rely on soft opt-in consent. According to the Privacy and Electronic Communications Regulations (PECR) We are allowed to market products or services to you which are related to the recruitment services we provide as long as you do not actively opt-out from these communications.



Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding consenting to receive marketing materials. For more information in relation to your jurisdiction, please [click here](#).

As we have mentioned, you have the right to withdraw your consent to these activities. You can do so at any time.

Establishing, Exercising or Defending Legal Claims

Sometimes it may be necessary for us to process personal data and, where appropriate and in accordance with local laws and requirements, sensitive personal data in connection with exercising or defending legal claims. Article 9(2)(f) of the Data Protection Act 2018 allows this where the processing "is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity".

This may arise for example where we need to take legal advice in relation to legal proceedings or are required by law to preserve or disclose certain information as part of the legal process.