



DCV Technologies Privacy Notice.

DCV Technologies ("We") are committed to protecting and respecting your privacy.

This notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a new regulation which replaces the Data Protection Regulation (Directive 95/46/EC). The Regulation aims to harmonise data protection legislation across EU member states, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

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 Candidate's. To be clear, if you are a member of DCV Technologies Staff, you should refer to the DCV Technologies 'Employee Privacy Policy' which is available on the internal HR drive.

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 here.

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.

Who we are and what we do

We are a recruitment Consultancy and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 (our business).

We collect the personal data of the following types of people to allow us to undertake our business;

- Candidates: Prospective and placed candidates for permanent/Temp/Contract roles;
- Client: Prospective and live client contacts;
- Suppliers: Supplier contacts to support our services;
- Website Users: visitors to our Website

We collect information about you to carry out our core business and ancillary activities.

Why do we collect your personal information?

We are retained by organisations to identify and place individuals into new employment opportunities. We have identified you as an individual that could be of interest to our clients.



We take your privacy very seriously and, in order for us to keep you informed about relevant opportunities, we request to hold your personal data. If you do not allow us to do this, we will be legally obliged to remove you from our database and can no longer put you forward for such opportunities.

What information do we collect?

Candidate Data: This is information about you that you give us by corresponding with us by phone, e-mail or otherwise. 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, compliance documentation, references verifying your experience, immigration status, financial information (where we need to carry out financial background checks), curriculum vitae, links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website 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. If you would like more information about this, please click <http://www.dcvtechnologies.co.uk/>

We may store further information where we have placed you or you are employed by us which could include start and end dates, pay history, umbrella company details and bank details.

Client Data: If you are a DCV customer, we need to collect and use information about you, or individuals at your organisation, in the course of providing you services such as finding Candidates who are the right fit for you or your organisation;

To the extent that you access our website we will also collect certain data from you. If you would like more information about this, please click <http://www.dcvtechnologies.co.uk/>

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. If you would like more information about this, please click <http://www.dcvtechnologies.co.uk/>

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 name and job title, Contact information (including e-mail address), enquiry message, demographic information (such as postcode), website usage data, other information relevant to client enquiries, other information pertaining to special offers and surveys, Google Analytics, IP address (this also helps us block repeated spam)

If you would like to find out more information about what data we collect about you when you visit our website, please click <http://www.dcvtechnologies.co.uk/>



How do we collect your personal data?

Candidate Data: There are two main ways in which we collect your personal data:

- Directly from you; and
- From other sources - This is information we obtain about you from other sources such as LinkedIn, corporate websites, job board websites, online CV libraries, your business card, personal recommendation. In this case we will inform you, by sending you this privacy notice, within a maximum of 30 days of collecting the data of the fact we hold personal data about you, the source the personal data originates from and whether it came from publicly accessible sources, and for what purpose we intend to retain and process your personal data

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. For more information please click <http://www.dcvtechnologies.co.uk/>

Client Data: There are two main ways in which we collect your personal data:

- Directly from you; and
- 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. For more information please click <http://www.dcvtechnologies.co.uk/>

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. For more information please click <http://www.dcvtechnologies.co.uk/>

Website User: We collect your data automatically via cookies when you visit our website, in line with cookie settings in your browser. If you would like to find out more about cookies, including how we use them and what choices are available to you, please click <http://www.dcvtechnologies.co.uk/> 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.

During our processing of your information we may use functions that could be defined as automated decision making. Typically, this would be where you have submitted a CV/resume to us and we use an industry standard 3rd party product which uses complex proven semantic and natural language algorithms to “read” and extract data from the submitted document and create a profile for you in our database. This information could later be used to then match your profile against vacancy profiles also stored within our database. We have conducted a Data Protection Impact Assessment and



matched profiles and vacancies are assessed by our staff before we contact you in regard to the position to ensure suitability. If you have any questions about this process or to request that we do not use this process during our relationship with you, please contact us.

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 identifying Candidates who we think will be the right fit for you or your organisation. 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.

Website User: 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 DCV, we may use data from your use of our websites to enhance other aspects of our communications with, or service to, you.

We may use cookies to:

- Analyse our web traffic using an analytics package. Aggregated usage data helps us improve the website structure, design, content and functions.
To recognise when you return to our website.
- Cookies do not provide us with access to your computer or any information about you, other than which you choose to share with us.

If you would like to find out more about cookies, including how we use them and what choices are available to you, please click <http://www.dcvtechnologies.co.uk/>

Please note that communications to and from DCV 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 will only make your personal information visible to the organisations we are working with when you are put forward for an opportunity or where required for the fulfilment and ongoing management of a contract where we have placed or hired you.

We may also disclose your personal information to third parties:

- If we use 3rd parties for running our business processes. An example of this might be that we have our emails or our database hosted in the cloud. Whilst these cloud providers would not typically have direct access to your information, storage is considered processing under the relevant data protection legislation. Similarly, as an example, if we have employed you directly we would need to send your data as required by law to local tax authorities;
- if we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;



- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use which includes exchanging information with other companies and organisations for the purposes of fraud protection.

Client Data: We will share your data primarily to ensure that we provide you with a suitable pool of Candidates;

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

Website Users: We use this data only to contact you about your enquiry.

Our legal basis for the processing

Our legal basis for the processing of personal data is our legitimate business interests, described in more detail below, although we will also rely on contract, legal obligation and consent for specific uses of data.

We will rely on contract if we are negotiating or have entered into a placement agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.

We will rely on legal obligation if we are legally required to hold information on to you to fulfil our legal obligations.

We will in some circumstances rely on consent for particular uses of your data and you will be asked for your express consent, if legally required. Examples of when consent may be the lawful basis for processing include permission to introduce you to a client (if you are a candidate).

Our Legitimate Business Interests

Our legitimate interests in collecting and retaining your personal data is described below:

As a recruitment business and recruitment Consultancy we introduce candidates to clients for permanent employment, temporary worker placements or independent professional contracts. The exchange of personal data of our candidates and our client contacts is a fundamental, essential part of this process.

In order to support our candidates' career aspirations and our clients' resourcing needs we require a database of candidate and client personal data containing historical information as well as current resourcing requirements.

To maintain, expand and develop our business we need to record the personal data of prospective candidates and client contacts to keep in contact re relevant job opportunities in the market.

How do we safeguard 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 <http://www.dcvtechnologies.co.uk/>



How long do we keep your personal data for?

We will delete 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 7 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 7 years from that point or, if later, for the period of 7 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 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.

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): 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. 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.

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. For more information in relation to your jurisdiction, please click



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 are 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 GDPR);
- it is necessary for the data to be erased in order for us to comply with our legal obligations as a data controller; or
- 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.

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

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; or
- 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 are able to transfer your Hays account details to another online platform. 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.

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 <http://www.dcvtechnologies.co.uk/>. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

Changes to this privacy notice

Any changes we may make to our privacy notice in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy notice.

Law and Jurisdiction

This privacy information notice is subject to the laws of England, and the non-exclusive jurisdiction of the English Courts. If you are domiciled in Scotland, Wales or Northern Ireland it can be enforced in your local court system.