

Modum

Modum Search Ltd

Client Candidate Privacy Notice

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It applies to all candidates that submit their details to be considered for work with our clients.

Modum Search Ltd is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former candidates. This notice does not form part of any contract to provide services.

We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

1. DATA PROTECTION PRINCIPLES

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.

3. Relevant to the purposes we have told you about and limited only to those purposes.

4. Accurate and kept up to date.

5. Kept only as long as necessary for the purposes we have told you about.

6. Kept securely.

2. THE KIND OF INFORMATION WE HOLD ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers and personal email addresses.
- Information contained in your CV or cover letter or related documents which you supply to us, which may include your date of birth, gender, work history, educational history and professional qualifications or memberships.
- Information in our correspondence with you in relation to potential roles.
- Information about your right to work in the UK.
- Information obtained from named referees.

We do not envisage that we will hold any sensitive personal data relating to you.

3. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

*Tintagel House, 92 Albert Embankment
www.modum-search.com
Registered Company No 10868973*

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We typically collect personal information about candidates through the application and recruitment process, either directly from candidates or from named referees. Once a candidate has been assessed in respect of a particular role, their personal information will (unless the candidate indicates otherwise) be retained on our database for consideration in respect of future roles.

We will collect additional personal information relating to your interest in potential roles and availability during the course of our correspondence with you.

4. HOW WE WILL USE INFORMATION ABOUT YOU

We will only use your personal information when the law allows us to. We will use your personal information where it is necessary for our legitimate interests to identify potential candidates for roles with our clients, and potential roles for you as a candidate, and your interests and fundamental rights do not override those interests, and to comply with our legal obligations.

In some circumstances, we will process your personal information on the basis of your express consent (for example, where you opt-in via a consent email or indicate you are willing to be approached via LinkedIn). You can unsubscribe from receiving marketing communications from us (including emails and LinkedIn messages notifying you of work opportunities) at any time by following the instructions contained in the messages you receive from us, or by contacting Yong Chong by email to yong@modum-search.com.

The situations in which we will process your personal information are listed below.

- Assessing your previous work history, skills and experience.
- Making a decision about your suitability for roles with our clients.
- Contacting you to discuss your interest in any specific roles that we believe are suitable for you.
- Carrying out reference checks. If you have provided personal contact details for named referees, by providing these details to us you are confirming that you have the named referees' consent to provide such information to us.
- Sending you direct marketing emails and messages on LinkedIn regarding available roles that may be of interest to you.
- Complying with our legal obligations.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

5. AUTOMATED DECISION-MAKING

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We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

6. DATA SHARING

We will not share your data with third parties without your explicit consent other than as required by law, for example to a regulator.

If we identify that you may be suitable for a role with one of our clients we will contact you to seek your prior consent to us providing your CV and related information to that client.

All our clients are required to take appropriate security measures to protect your personal information in line with our policies.

We do not anticipate transferring your information outside of the EU.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable

regulator of a suspected breach where we are legally required to do so.

8. DATA RETENTION

We will retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

The retention period for personal information on our database is usually 24 months from the date of the last communication between you and the company. At this stage we will send you an opt-in consent email to establish whether you wish to remain on our database. If you do not opt-in then your personal data will be deleted from our database.

In any event, the retention period for personal information on our database will usually be 3 years from the earlier of:

- a) the date that the data was collected and you were put onto the database; or
- b) the date when you last positively engaged with the company (e.g. to discuss potential roles or to refresh your consent via the opt-in consent email referred to above);

regardless of us having sent you communications in the meantime which you have not responded to.

9. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

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

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request the erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.
- Prevent us processing your information for direct marketing purposes. You can exercise your right to prevent this

processing by checking certain boxes on the forms we use to collect your data, by following the instructions contained in the marketing messages we send to you, or by contacting us using the details set out below.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, request that we transfer a copy of your personal information to another party or prevent us from using your data for direct marketing purposes, please contact Yong Chong by email to yong@modum-search.com.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

10. RIGHT TO WITHDRAW CONSENT

Where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose (e.g. where you have opted into receiving

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notifications from us regarding work opportunities) you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Yong Chong by email to yong@modum-search.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you choose to withdraw your consent then the lawfulness of our historic processing based on your consent will not be retrospectively affected by your withdrawal of consent.

11. CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.