

Candidate Policy

KTM Recruitment Solutions Limited is committed to protecting and respecting your privacy. We have created this policy to inform you and make sure we are transparent about our processes.

If you are a resident of the European Union, looking for a job – a permanent or contractor role – and using KTM Recruitment Solutions Limited services as a recruitment agency, this policy applies to you and we would like to share with you the details of how we process your data.

When you use KTM Recruitment Solutions Limited services, you trust us with your information and we want you to understand what data we collect, why we collect it and what we do with it. This is important, and we hope you will take time to read it carefully. Your new rights under GDPR will only apply once the GDPR comes into effect on 25 May 2018.

General Data Protection Regulation

In accordance with the General Data Protection Regulation (EU) 2016/679 ('GDPR') that comes into effect on 25 May 2018, KTM Recruitment Solutions Limited is obliged to issue a Data Processing Notice if we store your personal data in our database.

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

This Data Processing Notice will outline:

1. KTM Recruitment Solutions Limited as a data controller
2. Which personal data KTM Recruitment Solutions Limited collects
3. How KTM Recruitment Solutions Limited collects personal data
4. Why we hold your data and legal basis
5. How long will we store your data?
6. What are your rights under GDPR
7. Automated decision making, including profiling
8. Lodging a complaint
9. Changes to this Data Processing Notice
10. Contact details for GDPR and data queries

1. KTM Recruitment Solutions Limited as a data controller

KTM Recruitment Solutions Limited will be what's known as the 'Controller' of the personal data you provide to us. KTM Recruitment Solutions Limited

KTM Recruitment Solutions Limited is headquartered in the UK and has one member of staff with one computer.

Our offices address is: KTM Recruitment Solutions Limited, 207 Radstock Way, Merstham, Surrey RH1 3NQ.

Your personal data will be stored specifically in our outlook folders and our excel spreadsheet. Your personal data may also be shared with our clients for the purpose of introducing you or arranging interviews with them, upon prior written notice to you in which one of our staff members outlines which client(s) KTM Recruitment Solutions Limited will share your details with and the exact

data that will be forwarded to this client. Our employees will only share your personal data with our clients if you explicitly agree for them to do so.

We may furthermore disclose your personal information to third parties in the event that we sell or buy any business or assets, in which case we will have to disclose your personal data to the prospective seller or buyer of such business or assets. Furthermore, we may be under a duty to disclose or share your personal data in order to comply with any legal obligation, to defend our business against a legal claim or in order to enforce or apply our standard terms of business or other agreements or to protect the rights, property or safety of KTM Recruitment Solutions Limited, our customers, or other parties.

2. Which personal data KTM Recruitment Solutions Limited collects

KTM Recruitment Solutions Limited only collects personal data to help us match you with the right career opportunity.

KTM Recruitment Solutions Limited would typically collect the following personal data:

- Your full name
- Your registered address
- Your date of birth
- Your email addresses
- Your (mobile) telephone number
- Your website
- Professional profiles available in the public domain, e.g. LinkedIn, Twitter or Facebook
- Your CV
- Skillset (if not already covered in a CV)
- Job preferences (if not already covered in a CV)
- Current employer/client
- Your passport/visa, only when requested by the client
- Current salary/employment conditions
- Desired salary/ employment conditions
- Other documentation, if requested by our clients (e.g. references)

3. How KTM Recruitment Solutions Limited collects personal data

KTM Recruitment Solutions Limited collects your personal data in the following ways:

- You apply for a job in response to a job ad on ktms.co.uk
- You complete a 'Contact us' form on ktms.co.uk
- A KTM Recruitment Solutions Limited Recruitment Consultant gets in contact with you because they found your profile on a database/ job board you have subscribed to or registered your CV with and KTM Recruitment Solutions Limited uses these platforms to headhunt and access details of candidates
- We have received your details about you from another third party, for instance; a business contact, a client or professional advisors
- You applied for a job ad by KTM Recruitment Solutions Limited published on an external job board, e.g. Reed, Jobsite or LinkedIn, etc.

- You have met or spoken with a KTM Recruitment Solutions Limited Recruitment Consultant and are sharing information or sending your CV/application by email to KTM Recruitment Solutions Limited

When KTM Recruitment Solutions Limited receives your details in one of the above ways we save your application and information provided by you on our database. Your information and application will be reviewed by our consultants who will potentially share that information with our clients to advance your application, provided you have given your express consent to this upfront.

When we receive these details, our sales consultant will inform you as soon as possible of collecting the data of the source where your personal data originates from. If this information is not provided, please let us know straight away and we will confirm how we located your data.

4. Why we hold your data and legal basis

KTM Recruitment Solutions Limited will collect your information to carry out our core business and ancillary activities – for the purpose of recruitment services. In particular, KTM Recruitment Solutions Limited will collect and process your personal data for the following purposes:

- Introducing you to (potential) clients or employers of which the scope will be identified and communicated by one of our members of staff;
- Keeping your personal data on file for current and future opportunities that may arise; Evaluating your experience with KTM Recruitment Solutions Limited and our recruitment process;
- If we ask for a copy of your passport or visa, we do this as we may have to verify your identity and/ or the right to work.
- Clients may ask KTM Recruitment Solutions Limited to provide them with additional documentation (e.g. your passport details or references). If that happens we will ask for your permission to share these data with our clients. Please let us know if you have any issues with this.

The following legal basis applies for processing your data if we have been in touch with you within the last three years:

We will process your data as we believe that we have legitimate interests to do so. We have carried out a three-part test (a so-called legitimate interest's assessment).

As a recruitment business, we introduce candidates to clients for permanent employment and temporary worker placements (if you provide services as a contractor through KTM Recruitment Solutions Limited). The exchange of relevant personal data of our candidates to our client contacts is paramount if we want to provide services to our clients or support our candidate's career aspirations.

As we thus need to satisfy our client's resourcing needs we require an up-to-date database of candidate data. We would only use your personal data to introduce you to our clients and do not share more data with our clients than reasonably necessary. We would usually only process data that is already available online to other recruiters (e.g. a CV downloaded from a job board). We always ask for your permission before we process any of your sensitive data (e.g. passport copy or references). In practice, we would acquire this type of information only upon request when we introduce you to one of our clients.

Thus, to maintain, expand and develop our business we need to record the personal data of our (prospective) candidates who have been in touch with KTM Recruitment Solutions Limited within the last three years. We have chosen this three-year period as it is likely that (1) there is a(n) ongoing relationship between you and KTM Recruitment Solutions Limited (2) you may be looking for opportunities that KTM Recruitment Solutions Limited can help you with and (3) your data on our database is still up-to-date. We have also chosen this three-year period as we think this timeframe is regarded to be industry standard.

The following legal basis applies for processing your data if we have not been in touch with you within the last three years:

If you have not been in touch with us for the last three years, we understand that the data (1) we hold on file may be inaccurate (2) you may not be interested in getting contacted by KTM Recruitment Solutions Limited anymore.

We will, therefore, process your personal data only if you have given your consent for us to do so. We will request your consent by an email for the specific activity we require consent for and record your response on the database. You are entitled to withdraw consent or restrict the use of your personal information for whatever purpose at any time, without affecting the lawfulness of processing based on consent before its withdrawal. To opt out of any data processing and/ or email communications from us, please return an email stating "PLEASE FORGET ME" for an immediate removal from our database and /or further communications.

Furthermore, if you previously agreed to us holding or using your personal information, you may change your mind at any time by emailing megan@ktmrs.co.uk. We will process the restriction of use in our marketing communications or removal of your personal information within 30 working days.

The following legal basis applies for processing your data if you are (permanently) employed by one of our clients:

If you are a candidate of KTM Recruitment Solutions Limited and have been successfully hired by one of our clients, we have a legal obligation to keep your data on file for six years. This legal requirement is in place so that KTM Recruitment Solutions Limited is able to evidence any transactions with our clients for tax purposes and to be able to produce proof of the placement should any legal claims arise against KTM Recruitment Solutions Limited by any parties involved during the recruitment and/or hiring process.

5. How long will we store your data?

Your personal data will be stored in our systems for six years following the date your profile was added to our database. However, if you do not stay in touch with us for a period of more than three years your data will be deleted unless you give KTM Recruitment Solutions Limited consent that we can process your data for another three years. If you do not give us consent to hold your data, then we will remove your data from our database.

Your personal data will be stored in our database for three consecutive years. As long as you are working with KTM Recruitment Solutions Limited's Recruitment Consultants on your next career step, we will keep your data on file to be able to match you with the latest opportunities and to contact you.

Your data will be removed from our systems if

- a) We have not heard from you during a period of three years, or
- b) If you request for your data to be removed

Different retention periods apply if

- a) you have entered into an agreement with KTM Recruitment Solutions Limited for which a different Data Processing Notice applies (see for example Privacy Policy for Contractors) or
- b) unless there is a direct statutory requirement (that comes into force) under which KTM Recruitment Solutions Limited is obliged to keep your data stored in our internal databases for another period of time. This applies for example if you are hired by one of our clients and KTM Recruitment Solutions Limited subsequently needs to keep records to the relevant transaction.

6. What are your rights under GDPR

Under GDPR you are entitled to various rights:

- You can 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. This means when working with our Recruitment consultants, make sure you notify us of any changes or update your information like email, phone number etc. when they change.
- You can request 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 delete or remove your personal information where you have exercised your right to object to processing (see below). This means should you wish to be removed from KTM Recruitment Solutions Limited's database, please email megan@ktmrs.co.uk specifying this. We will review and process your request within 30 days.
- You can object to the processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- You can 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.
- You can request the transfer of your personal information to another party in certain formats, if practicable.

All such requests need to be addressed to megan@ktmrs.co.uk

The fact that you can lodge a request does not necessarily mean we will grant your request, at all times, especially if KTM Recruitment Solutions Limited has a legitimate interest that outweighs your interests as an individual.

KTM Recruitment Solutions Limited will, however, provide information without undue delay and in any event within one month (this can be extended to 2 months in exceptional circumstances) of the receipt of the request, however where requests are manifestly unfounded or excessive, in particular, because of its repetitive character, KTM Recruitment Solutions Limited may refuse to act upon your request. In that case, we will inform you within one month of the request of the possibility of lodging a complaint with a supervisory authority (in the UK this will be the ICO) or seeking a judicial remedy.

7. Automated decision making, including profiling

KTM Recruitment Solutions Limited will not conduct any forms of automated processing of your personal data consisting of the use of personal data to evaluate certain personal aspects relating to you, in particular, to analyse or predict aspects concerning your personal preferences, job roles interests, reliability, behaviour, location or movements. We will not make decisions that are based solely on automated processing which produces legal effects, or similarly significantly affects you as a data subject.

8. Lodging a complaint

If you feel that your rights as a data subject have been breached, you are entitled to lodge a complaint with the national supervisory authority (in the UK this will be the Information Commissioner's Office via <https://ico.org.uk/concerns/>) or seek a legal remedy. However, we strongly encourage you to contact us via megan@ktmrs.co.uk

9. Changes to this Data Processing Notice

Any changes we make to our Data Processing Notice in the future will be posted on this website and where appropriate (if we make any significant changes that may affect your rights as a data subject), notified to you by email. Please check back frequently to see any updates or changes to this Data Processing Notice.

10. Contact details for GDPR and data queries

If you have any questions, comments, and requests regarding your personal data or this policy, please address them to:

Megan Green (Director)
KTM Recruitment Solutions Limited
207 Radstock Way
Merstham
Surrey
RH1 3NQ

T: 01737 570 028

M: 07983 966 838

E: megan@ktmrs.co.uk