

Recruitment Privacy Policy

This policy explains how we will handle your personal data as part of our recruitment efforts.

Our general Privacy Policy is available [here](#).

Personal data we collect in the course of recruitment

In the course of performing recruitment activity the types of personal data collected, used, stored and transferred by us may include:

- **Identity Data:** including your forename(s), middle name(s) and last name.
- **Contact Data:** including your email address, correspondence address and telephone numbers.
- **Career Data:** including any information contained in your CV, covering letter or online career profile.
- **Technical Data:** including internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices used to access our website.
- **Usage Data:** including how you use our website.

How do we collect personal data in the course of recruitment?

In the course of performing recruitment activity personal data may be collected via the following methods:

- **Direct interaction:** in person, by telephone, email, post or otherwise when you contact us regarding employment opportunities
- **Automated Technologies:** when you use our website to contact us regarding employment opportunities.
- **From third parties:** when your information is passed to us by third parties such as recruitment agents or third party job boards or recruitment websites. Also, when your information is sourced by us from CV or candidate databases maintained by third parties or publicly available sources such as LinkedIn.

How do we use personal data in the course of recruitment?

In the course of performing recruitment activity personal data is used in the following ways:

Purpose / Activity	Type of Data	Lawful Basis for Processing
To initially contact you to discuss employment opportunities	Identity Contact Career	- Consent; and/or - Necessary for our legitimate interests (to respond to your application and/or to further our recruitment efforts)
To engage with you during the recruitment process	Identity Contact Career	- Necessary for our legitimate interests (to further our recruitment efforts); and/or - In your legitimate interests (to further your application).
To make decisions on whether to extend an offer of employment	Identity Contact Career	- Necessary for our legitimate interests (to further our recruitment efforts); and/or - In your legitimate interests (to further your application).
To respond to complaints or legal actions	Identity Contact Career Transaction Technical Usage	- To comply with a legal obligation; and/or - Necessary for our legitimate interests (to ensure complaints can be responded to accurately, to ensure legal actions can be pursued or defended).
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Contact Career Transaction Technical Usage	- To comply with a legal obligation; and/or - Necessary for our legitimate interests (for running our business, websites and technical services, to prevent fraud).

Change of purpose

We will only use your personal data for the purposes explained above, unless we reasonably consider that we need to use it for another reason and it is compatible with the original purpose. Please contact us for an explanation as to how any new processing is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Changes to our Privacy Policy

We keep our Recruitment Privacy Policy under regular review and we will place any updates on this web page. This Recruitment Privacy Policy was last updated on 25th May 2018.

Marketing by third parties

Your personal information will not be passed to any third-party organisation for the purposes of their marketing to you.

Third party links or data

Our website may include links to third-party websites, plug-ins and/or applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies. When you leave our website, we encourage you to read the privacy policies of each website you visit.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also limit access to your personal data to only those employees, advisers, business partners and suppliers who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

Sharing of personal data outside of the European Economic Area

We operate multiple entities under the Flashbay brand, including in the UK, USA, Australia, China and the Philippines. Our recruitment process may require assistance from or work to be conducted by multiple Flashbay entities and where we share data with other Flashbay entities we ensure that they provide the same level of protection for personal data as it has in the EEA.

Some of our external suppliers are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA. In such cases we ensure that your personal data is sufficiently protected. We may also use specific contracts approved by the European Commission that provide the same level of protection for personal data as it has in the EEA.

Who do we disclose personal data to?

In the course of performing recruitment activity data may be disclosed to the following parties:

Type of Recipient	Reason
Other Flashbay entities	To support the operation of the recruitment process

Courier or fulfilment companies	To deliver materials to you
Legal advisors	To advise on legal issues
With regulators or authorities	To fulfil our legal obligations
Others	Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, if we acquire other businesses or restructure our business the new owners may use your personal data in the same way as set out in this privacy notice.

These parties are required to ensure appropriate security measures are in place and maintain the confidentiality of your personal data, and to use your personal data only in the course of providing such services and in accordance with our instructions.

How long is your personal data retained?

Your personal data is retained for as long as necessary to support our legitimate interests in recruiting new employees and then for sufficient duration to ensure compliance with our obligations under the laws of England and Wales and to support or defend any claims made by or against us. After this time the data will be deleted.

Your rights regarding your personal data

You have the right to:

- **Request access** to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of your personal data. This enables you to have any incomplete or inaccurate data corrected. Please note that we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete personal data where there is no good reason for us continuing to process it. You can also ask us to delete your personal data where you have successfully objected to the processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with a legal obligation. Note, however, that we may not always be able to delete the data for specific legal reasons which will be notified to you, if applicable, in response to your request.
- **Object to processing** of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is not lawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent or processing carried out under a legal basis other than consent. If you withdraw your consent, we may not be able to continue to engage with you as part of a recruitment process.

Questions?

If you have any questions or complaints relating to how we use your personal data, or if you wish to exercise any of your rights regarding your personal data, please email data.questions@flashbay.com or write to us at our registered address. We will respond to you as soon as is practical. The length of time will depend on the type and complexity of the request and the volume of requests being processed, but you will receive a response no later than one month from receipt of the initial request.

Regulator

The Information Commissioner's Office (ICO) is the regulator for data protection in the United Kingdom.