

Transparency Notice

INTRODUCTION

Welcome to our Transparency Notice.

To understand who we are and how we look after your Personal Data, what your privacy rights are and how the law protects you, we recommend that you take the time to read this Transparency Notice.

Our Transparency Notice is provided to you in a layered format so you can easily understand the information it contains. Please use the below section headings to help guide you. Where we have used terms that have capital letters, e.g. Explicit Consent, please refer to the Glossary section at the end of our Transparency Notice.

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1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS TRANSPARENCY NOTICE

This Transparency Notice explains:

- what we do with your Personal Data
- why we need your Personal Data
- who we share your Personal Data with
- our relationship with you

This Transparency Notice applies to the Personal Data of our:

- Candidates
- Clients
- Suppliers
- Staff
- Website users
- Other third parties whom we may deal with, e.g. referees

CONTROLLER

The Serocor Group is made up of different legal entities, details of which can be found below. The relevant legal entity in the Serocor Group responsible for processing the Personal Data of candidates, clients, suppliers, staff and others will depend on which company you have an arrangement with.

UK Serocor Entities

Each UK legal entity in the Serocor Group is registered as a data controller with the Information Commissioner's Office (ICO), the UK Data Protection Supervisory Authority (www.ico.org.uk):

- Advanced Resource Managers Limited (ICO Registration Number: Z9352884)
- Advanced Resource Managers IT Limited (ICO Registration Number: Z6525711)
- Advanced Resource Managers Engineering Limited (ICO Registration Number: Z8922161)
- Bloc Digital Talent Limited (ICO Registration Number: ZA005344)
- Optamor Limited (ICO Registration Number: ZA005342)
- Hawker Chase Executive Limited (ICO Registration Number: Z2140061)
- ZYX Associates Limited (ICO Registration Number: ZA235064)
- Serocor Solutions Limited (ICO Registration Number: ZA005353)

Serocor Entities outside the UK

Orson GmbH is a German recruitment company within the Serocor Group. Orson GmbH is registered as a data controller with the Supervisory Authority in Germany set out below:

Note: Orson GmbH operates its own systems and databases which are separate to the systems and databases operated by the UK Serocor Entities.

For more information about Orson GmbH's data protection processes, including any requests to exercise your legal rights, please refer to the relevant section in the privacy statement on Orson GmbH's website: <https://orson-consulting.com/en/datenschutz>.

This Transparency Notice is issued on behalf of the UK Serocor Entities so any reference to "we", "us" or "our" is a reference to the relevant UK legal entity in the Serocor Group responsible for processing your Personal Data. We will let you know which UK legal entity in the Serocor Group that will be processing your Personal Data at the point we receive your information and begin providing our services to you.

Contact Details

We are not required to appoint a Data Protection Officer for the Serocor Group however we do have a designated data protection subject matter expert. If we later decide to appoint a data protection officer, we will update this Transparency Notice.

If you have any questions about this Transparency Notice, including any requests to exercise your legal rights, please contact us using the details set out below:

- Email Address: DPO@serocor.com
- Postal Address: Langstone Technology Park, Havant, Hampshire, PO9 1SA

Please specify that the communication is for the attention of the Data Protection Officer.

Complaints

If you wish to complain about our Transparency Notice or any of the procedures set out in it, please do contact us as we would appreciate the opportunity to deal with your concerns.

You also have the right to raise your concerns at any time to the ICO if you believe that your data protection rights have not been adhered to. You can contact the ICO on 0303 123 1113 or at <https://ico.org.uk/concerns/>.

CHANGES TO OUR TRANSPARENCY NOTICE

Our Transparency Notice was last updated on 17th September 2019.

We may revise or supplement our Transparency Notice from time to time in accordance with any legislative requirements and/or any changes that we may make to the services we provide to you. We will update our Transparency Notice and supporting documentation accordingly. We recommend that you revisit our Transparency Notice regularly to ensure that you are familiar with how we use your Personal Data and your rights at any given time.

It is important that the Personal Data we hold and process is accurate and up-to-date. Please keep us informed of any changes to your Personal Data during your relationship with us.

THIRD-PARTY LINKS

Our website may include links to third party websites, plug-ins and 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 notices. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. PRINCIPLES OF PROCESSING YOUR PERSONAL DATA

Under Data Protection Legislation, we must adhere to, and demonstrate compliance with, 6 key principles. Personal data must be:

1. processed lawfully, fairly and in a transparent manner in relation to a data subject.
2. collected for specified, explicit and legitimate purposes.
3. adequate, relevant and limited to what is necessary for the purpose of the processing.
4. accurate and, where necessary, kept up to date.
5. retained for no longer than is necessary for the purpose of the processing.
6. processed using appropriate technical or organisational measures to ensure appropriate security of the Personal Data, including protection against unauthorised or unlawful processing.

Our Transparency Notice aims to provide you with enough information to demonstrate our compliance with these key principles.

3. YOUR PERSONAL DATA

As part of the services we provide, we collect different types of Personal Data. However we will only collect Personal Data which is relevant to our relationship and/or the services that we provide.

For our candidates and contractors

The Personal Data we collect about candidates and contractors can vary depending on the relevant circumstances and applicable requirements, but will enable us to provide and offer you with employment opportunities with our clients.

We will hold information relating to you including (but not limited to) your name, date of birth, gender, contact details, education details, employment history, immigration status, referee details, copies of your driving licence or passport and relevant qualifications.

We may also hold information relating to your financial history and/or any criminal convictions where we need to carry out background checks that are required for a role you may be applying for.

For our clients

The Personal Data we collect about clients is limited to the contact details of individuals working at your organisation, e.g. names, email address, phone number) and your online engagement with candidate profiles and other material we may provide, which we use to ensure that our communications to you are relevant and timely, to enable us to ensure that we can manage our relationship with you effectively.

For our suppliers

The Personal Data we collect about suppliers is limited to the contact details of individuals working at your organisation and bank details to enable us to ensure that we can manage our relationship with you effectively.

For our website users

The Personal Data we collect about visitors to our website is limited to information to help improve our website and to provide you with the best user experience. Through the use of cookies, we collect 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 and the time that you access our website.

If you would like to know more about our cookies, we recommend that you read the cookies section below.

For our staff

The Personal Data we collect about our staff is required for a number of different purposes including (but not limited to): employment, financial and tax records. We will hold information relating to you including your name, data of birth, gender, contact details, emergency contact details, education details, employment history, immigration status, referee details, bank details, copies of your driving licence or passport and relevant qualifications.

This is not an exhaustive list so we recommend that you review our full list of processing activities by referring to our Data Processing Document (available on our Group Privacy Centre – <http://www.serocor.com/PrivacyCentre.aspx>) for further information.

SPECIAL CATEGORY (SENSITIVE) PERSONAL DATA

From time to time, we may be required to collect and process Special Categories of Personal Data about you.

For our candidates and contractors

We are required to collect and process information about you to conduct criminal background checks and/or financial credit checks if a position you are interested in applying for requires us to undertake them. We shall only conduct these checks where we have obtained your prior written Explicit Consent.

For our staff

We may from time to time be required to conduct criminal background checks on our staff. In such circumstances, we shall only do so where we have either obtained your prior written Explicit Consent or the processing is required to comply with employment legislation.

IF YOU FAIL TO PROVIDE YOUR PERSONAL DATA TO US

Where we need to collect Personal Data by law or under the terms of a contract we have with you, and you fail to provide that Personal Data when requested, we may not be able to perform the contract we have, or are trying to enter into, with you. In this case, we may have to cancel or suspend our services to you.

If you wish to know more about how and why we process your Personal Data, please review our Data Processing Document (available on our Group Privacy Centre – <http://www.serocor.com/PrivacyCentre.aspx>).

4. HOW WE COLLECT YOUR PERSONAL DATA

We use different methods to collect Personal Data from and about you. We have set out these out below:

For our candidates and contractors

We have collected your Personal Data from one of the following sources:

- **From you directly:** this may include any Personal Data that you provide us over the phone, by email, by post, through our website or through our social media channels such as LinkedIn or Twitter.
- **From a job board:** where you are registered on a job board and you have indicated or are marked as someone with the skills and experience relevant to our recruitment sectors, we may obtain your Personal Data from that job board.
- **From a professional networking website:** where you are registered on a professional networking website such as LinkedIn and you have indicated or are marked as someone with

the skills and experience relevant to our recruitment sectors, we may obtain your Personal Data from that networking website.

- **From our clients:** our clients, which may include a managed services provider as well as the end-client, may share your Personal Data with us as part of the services we are providing to you and our clients.
- **From other candidates:** our candidates and contractors may share your Personal Data with us as a recommendation for a work opportunity with our clients.

For our clients and suppliers

We have collected your Personal Data from one of the following sources:

- **From you directly:** this may include any Personal Data that you provide us over the phone, by email, by post, through either our or your website or any social media channels we are both active on, such as LinkedIn or Twitter. We may also collect your Personal Data where we contact you through our general business development activities.
- **From other third party sources:** as part of our due diligence on clients and/or suppliers, we may collect your Personal Data through third party market research, or from delegate lists at relevant industry events or other marketing lists.
- **From our candidates:** on occasion, we may collect your Personal Data where a candidate uses you as a referee for them.

For our staff (including potential staff)

We have collected your Personal Data from one of the following sources:

- **From you directly:** this may include any Personal Data that you provide us over the phone, by email, by post, through our website or through our social media channels such as LinkedIn or Twitter, part of your initial job application and throughout your employment (including any restrictive covenant period).
- **From a job board:** where you are registered on a job board and you have indicated or are marked as someone with the skills and experience relevant to our business, we may obtain your Personal Data.
- **From a professional networking website:** where you are registered on a professional networking website such as LinkedIn and you have indicated or are marked as someone with the skills and experience relevant to our business, we may obtain your Personal Data.
- **From other third party sources:** this may include a recruitment company who you are registered with.

For our website users

As you interact with our website, we may automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this data by using cookies and other similar technologies. For more information about cookies and how we use them, we recommend that you read the cookies section below.

5. PERSONAL DATA THAT WE PROCESS AND OUR LAWFUL BASIS FOR PROCESSING

In order to process your Personal Data in a manner consistent with Data Protection Legislation, we are required to have a “lawful basis” for each purpose of processing. Most commonly, we will process your Personal Data under the following bases:

- Performance of a Contract
- Legitimate Interests
- Comply with a Legal or Regulatory Obligation

Consent

Generally we do not rely on Consent as a lawful basis for processing your Personal Data other than to send direct marketing communications to you via email, telephone or text message. Where we do rely on Consent, you have the right to withdraw your Consent at any time by emailing unsubscribe@serocor.com.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We process your Personal Data in a number of different ways and have identified which lawful basis we are relying on for each purpose. Where appropriate, we have also identified what our Legitimate Interests are in order to provide you with enough information to understand our reasons for the processing.

On occasion, we may process your Personal Data for more than one lawful basis depending on the specific purpose for which we are using your Personal Data.

If you wish to know more about how we process your Personal Data and the lawful basis we are relying on for each purpose of processing, please review our Data Processing Document (available on our Group Privacy Centre – <http://www.serocor.com/PrivacyCentre.aspx>).

MARKETING

We will never send you any marketing communications unless you have opted-in and provided us with your Consent. If you are subscribed to receive marketing communications from us, you can unsubscribe at any time by emailing unsubscribe@serocor.com.

COOKIES

We use cookies on our website in order to improve our website and provide you with the best user experience. We recommend that you review our Group cookie policy (available on our Group Privacy Centre – <http://www.serocor.com/PrivacyCentre.aspx>) and the relevant cookie list which is available on the relevant Serocor Group legal entity website for more information about cookies and how we use them.

PROFILING AND AUTOMATIC DECISION-MAKING

We do not carry out any Automated Decision-Making as part of our services to you. In the event we were to change our approach and implement any form of Automated Decision-Making, we would only include your Personal Data where we have obtained your Explicit Consent.

We do however conduct Profiling as part of the services that we provide, including (but not limited to): recruitment services to you if you are a candidate, contractor or a client; or to help us decide whether to hire you as a member of our staff. In such circumstances, it is necessary for us to build a profile using Personal Data provided to us directly by the Data Subject but also indirectly from other sources such as a job board, a professional networking website and/or referees.

If we are unable to build a profile about you, then we may not be able to provide you the full extent of our services.

For our staff (including potential staff)

We use psychometric testing to help determine whether you are suitable for the position you are applying for with us. This testing helps to describe you individual characteristics including information about your personality and cognitive abilities.

For our candidates and contractors

We have implemented candidate sourcing software provided by a third party called Pocket Recruiter, Inc. This software works by analysing the Personal Data we have collected about you, mainly your CV, against vacancies and work opportunities that our clients have asked us to help with. The results of searches of candidates against the vacancies are ranked by the software, with those profiles that most closely match the vacancy requirements receiving a higher rank. This software **does not** make any actual or legal decisions about you or your suitability for a particular role. A person is always involved from the beginning to the end of this process and it is people who decide, subject to your prior agreement, whether to put you forward for a work opportunity.

MONITORING

We may from time to time monitor and record communications with you (such as emails and telephone conversations) for the purpose of quality assurance, training, fraud prevention and compliance.

CHANGE OF PURPOSE

We will only use your Personal Data for the purposes for which we collected it. However if we reasonably consider that we need to use your Personal Data for another reason and that reason is compatible with the original purpose, we may use it for another purpose.

We will update our Data Processing Document (available on our Group Privacy Centre – <http://www.serocor.com/PrivacyCentre.aspx>) with any new purpose for which we process your Personal Data. However if you would like a more in-depth explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at DPO@serocor.com.

6. DISCLOSURE AND SHARING OF YOUR PERSONAL DATA

We may have to share your Personal Data with the parties set out below in order to provide our services to you or manage our employment relationship:

- Internal Third Parties
- External Third Parties

We require all third parties to respect the security of your Personal Data and to treat it in accordance with Data Protection Legislation. We do not allow our third party suppliers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our written instructions.

For more information about who we may share your Personal Data with, please refer to our Data Processing Document (available on our Group Privacy Centre – <http://www.serocor.com/PrivacyCentre.aspx>).

7. OVERSEAS AND INTERNATIONAL TRANSFERS

To ensure that we are providing you with the best service available, we may from time to time transfer your Personal Data overseas to countries and/or territories around the world, including outside of the European Economic Area (EEA). In such circumstances, we will do so where the receiving party is compliant with Data Protection Legislation and we are satisfied that there are adequate safeguards in place in relation to your Personal Data.

As part of our services and/or employment obligations, we have engaged with a number of third party suppliers who are based outside of the EEA, including:

1. Interactive Manpower Solutions Private Limited (IMS): IMS is based in India and provides general support services to us.
2. Pocket Recruiter, Inc (Pocket Recruiter): Pocket Recruiter is based in the USA and provides general support services to us.

Please refer to our Data Processing Document (available on our Group Privacy Centre – <http://www.serocor.com/PrivacyCentre.aspx>) for more information about who we share Personal Data with.

To ensure that your Personal Data is adequately protected with IMS and Pocket Recruiter, we have a written agreement in place with each of them 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. Accordingly, we do not require your Explicit Consent to transfer or share your Personal Data with these third party suppliers.

Where we work with other companies based outside of the EEA and we cannot adequately safeguard your Personal Data, we will only transfer your Personal Data where we have obtained your prior written Explicit Consent.

For contractors

Where we are supporting you with an assignment located in a country outside the EEA, we will need to transfer your Personal Data to one of our in-country partners who support us with payroll in that country. To ensure that your personal information receives an adequate level of protection, we have put in place appropriate procedures with the third parties whom 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 Data Protection Legislation.

For clients

In certain circumstances where it is necessary for the Performance of a Contract between ourselves and a third party and the transfer is in your interests for the purposes of that contract, then we will obtain your prior written Explicit Consent before undertaking the transfer (for example, if we are engaging a training provider based outside the EEA and we need to transfer your employees' Personal Data to the training provider in order to meet our obligations under our contract with you).

For staff (including potential staff)

Where we have employees located in countries other than the UK, we may need to transfer your Personal Data to in-country partners who support us with payroll or other services in that country. To ensure that your personal information receives an adequate level of protection, we have put in place appropriate procedures with the third parties whom 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 Data Protection Legislation.

8. 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. Your Personal Data is stored on secure servers based in the UK and we limit access to your Personal Data to those employees, agents, contractors and other Internal and External Third Parties who have a strict business need to know. Unless they are a data controller in their own right in respect to the Personal Data, they will only process your Personal Data on our written instructions and they are subject to a duty of confidentiality.

We have also put in place procedures to deal with any suspected Personal Data breach and will notify you and the ICO, or any applicable Data Protection Supervisory Authority, of a breach where we are legally required to do so.

9. DATA RETENTION

We will only retain your Personal Data for as long as necessary to fulfil the purposes which we have collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, age, accuracy and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means. Accordingly, we have different retention periods for different types of Personal Data.

For example, the Conduct of Employment Agencies and Employment Businesses Regulations 2003 require us to keep work-seeker records (e.g. name, address, CV details, etc) 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-seeking services. However in respect to Financial and Transaction Data, we are required to keep this

information for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation.

We may also anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

In some circumstances you can ask us to delete your Personal Data and we recommend you read the section relating to your legal rights for further information.

For more information about our retention periods for each type of Personal Data that we process, please review our Data Processing Document (available on our Group Privacy Centre – <http://www.serocor.com/PrivacyCentre.aspx>).

10. YOUR LEGAL RIGHTS

Unless subject to an exemption under the Data Protection Legislation, you have the following rights with respect to your Personal Data:

- **Right to be informed:** you have a right to be made aware of how we use your Personal Data. This Transparency Notice sets out our fair processing information.
- **Right to withdraw your Consent:** you have the right to withdraw your Consent to the processing at any time. If we are relying on a different lawful basis for processing your Personal Data other than Consent, then withdrawing your Consent will not restrict our processing.
- **Right of access:** you have the right to access the Personal Data we hold on you including any supplementary information.
- **Right to rectification:** you have the right to have your Personal Data rectified if it is inaccurate or incomplete.
- **Right to erasure:** you have the right ‘to be forgotten’ and request the deletion or removal of Personal Data that we hold on you where it is no longer necessary for us to continue processing it. Please note that this is not an absolute right so there may be circumstances in which we cannot delete your Personal Data. We will advise you of the reasons in such an event. If you would like us to remove your details from our database, then please do let us know by emailing unsubscribe@serocor.com.
- **Right to restrict processing:** you have the right to block our processing of your Personal Data where there is a dispute in relation to the accuracy or processing of your Personal Data.
- **Right to data portability:** you have the right to obtain, re-use and transfer the Personal Data we hold for your own purposes.
- **Right to object:** you have the right to object to how we process your data, where applicable.
- **Rights related to automated decision making (including profiling):** you have the right not to be subject to a decision based solely on automated processing.

If you have any other queries in relation to your rights, please refer to the “Contact Details” section for further information.

11. GLOSSARY

The following terminology has been used throughout our Transparency Notice. We have created this glossary section to help you understand the use of this terminology however if you have any further questions, please do contact us.

Terminology	Definition
Automated Decision-Making	means a decision based solely on automated processing of personal aspects relating to you, including profiling, with no human intervention which produces legal effects concerning you.
Comply with a legal or regulatory obligation	means processing your Personal Data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.
Consent	means 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.
Contact Data	includes email addresses, telephone numbers, billing address and delivery address.
Data Processing Document	means the document which details our processing activities.
Data Protection Legislation	means the Data Protection Act 2018 and any amendment or re-enactment thereof, including the General Data Protection Regulation and other applicable legislation.
Data Protection Officer	means an individual who is responsible for overseeing data protection strategy and implementation to ensure compliance with the GDPR.
Data Protection Supervisory Authority	means a supervisory authority or regulator which is concerned by the processing by the processing of Personal Data because: <ul style="list-style-type: none"> - the Data Controller or Data Processor is established on the territory of the Member State of that supervisory authority; - Data Subjects residing in the Member State of that supervisory authority are substantially affected or likely to be substantially affected by the processing; or - a complaint has been lodged with that supervisory authority.
Explicit Consent	means any Consent required and/or obtained in relation to the use of: <ul style="list-style-type: none"> - Special Categories of Personal Data; - Automated decision-making; - Overseas transfers in the absence of adequate safeguards.
External Third Parties	means any: <ul style="list-style-type: none"> - Suppliers and business partners who provide support services; - Professional advisors including lawyers, bankers, auditors and insurers who provide legal, banking, accounting and insurance services; - HM Revenue & Customs, regulators and authorities who require reporting of processing activities in certain circumstances; - Other law enforcement agencies in connection with any investigation to help prevent unlawful activity or as otherwise required by applicable law; - Any other third parties we may require access to and/or process Personal Data.
Financial Data	includes bank account and payment card details.

Identity Data	includes first name, maiden name, surname, username or similar identifier, marital status, title, date of birth and gender.
Internal Third Parties	means any of the companies in the Serocor Group (including any future companies which may become part of the Serocor Group).
Legitimate Interests	means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your Consent or are otherwise required or permitted to by law).
Performance of a Contract	means processing your Personal Data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
Personal Data	means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
Profiling	means any form of automated processing intended to evaluate certain personal aspects of you to predict your performance and behaviour, among other criteria.
Special Categories of Personal Data	means any Personal Data which includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.
Technical Data	includes internet protocol (IP) address, your login data, 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 you use to access this website.
Transaction Data	includes details about payments to and from you and other details of products and services we have provided to you.
Usage Data	includes information about how you use our website, products and services.