1st Recruitment Privacy Policy

Introduction

The General Data Protection Regulation (GDPR) is an EU Regulation designed to seek to give greater control around and protection to personal information. In Jersey the requirements of the GDPR were implemented by two new data protection laws in May 2018:

The Data Protection (Jersey) Law 2018 and

The Data Protection Authority (Jersey) Law 2018.

- 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 we may contact to enable us to carry out our service as a Recruitment Agency in order to find out more about our Candidates to assist in their search for work and or whom they indicate is an emergency contact. It also applies to the emergency contacts of our Staff. If you are a member of 1st Recruitment's Staff you should also refer to the 1st Recruitment Staff Privacy Policy.

- 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.

- This Privacy Policy applies in relevant countries throughout our international network. Different countries may approach data privacy in slightly different ways and so we also have country-specific parts to this Privacy Policy. You can find country-specific terms for your jurisdiction below under ANNEX 3 – COUNTRY-SPECIFIC VARIATIONS TO OUR PRIVACY POLICY. This allows us to ensure that we're complying with all applicable data privacy protections, no matter where you are.

- Jersey Office of The Information Commissioner is an independent statutory authority and its mission is to promote respect for the private lives of individuals through ensuring privacy of their personal information by:

  (a) Implementing and ensuring compliance with the Data Protection (Jersey) Law 2018 and the Data Protection Authority (Jersey) Law 2018, and; influencing thinking on privacy and processing of personal information matters on a local and international basis.

  (b) Maintaining a register of personal data users who are processing personal information in Jersey

  (c) Implementing and ensuring compliance with the Freedom of Information (Jersey) Law 2011.

SHORT FORM -SUMMARY SECTION

What kind of personal data do we collect?

- **CANDIDATE DATA:** 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, emergency contacts, immigration status, financial information (where we need to carry out financial background checks), and social security number (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.

If you would like a more detailed description of the personal data that we collect about you, please see below under LONG FORM DETAILED SECTION - WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT?

- 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 see below under **LONG FORM SECTION – WEBSITE USERS.**

- **CLIENT DATA:** If you are a 1st Recruitment Client, we need to collect and use information about you, or individuals at your organisation, in the course of providing you services such as: (i) sourcing Candidates who are the right fit for you or your organisation; (ii) providing you with a Managed Service Provider (MSP) or assisting another organisation to do so); (iii) providing you with Recruitment Process Outsourcing (RPO) services (or assisting another organisation to do so); and/or (iv) notifying you of content published by 1st Recruitment which is likely to be relevant.

- If you would like a more detailed description of the personal data that we collect in this way, please see below under **LONG FORM SECTION - CLIENT DATA.**

- 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 see below under **LONG FORM SECTION - WEBSITE USERS**.

- **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).

- If you would like a more detailed description of the personal data that we collect about you, please see below under **LONG FORM SECTION - SUPPLIER DATA**.

- 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 see below under **LONG FORM SECTION - WEBSITE USERS**.

- **PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS**: In order to provide Candidates with suitable employment opportunities safely and securely and to provide for every eventuality for them and our Staff, we need some basic background information. We only ask for very basic contact details, so that we can get in touch with you either for a reference or because you've been listed as an emergency contact for one of our Candidates or Staff members. If you would like a more detailed description of the personal data that we collect about you, please see below under - **LONG FORM SECTION - WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT.**

- **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 how you use our website, the frequency with which you access our website, and the times that our website is the most popular.

- If you would like to find out more information about what data we collect about you when you visit our website see below under **LONG FORM SECTION - WEBSITE USERS**

A number of elements of the personal data we collect from you are required to enable us to fulfil our duties to you or to others, for example we may require Candidates social security number and tax codes which are required by statute or other laws.

Depending on the type of personal data in question and the grounds on which we may be processing it, should you decline to provide us with such data, we may not be able to fulfil our contractual requirements or, in extreme cases, may not be able to continue with our relationship.

How do we collect your personal data?

- **CANDIDATE DATA:** There are two main ways in which we collect your personal data:

  1. Directly from you; and
  2. From third parties.

- If you want to know more about how we collect your personal data, please see **LONG FORM SECTION - HOW DO WE COLLECT 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 see **LONG FORM SECTION – HOW DO WE COLLECT YOUR PERSONAL DATA.**

- **CLIENT DATA:** There are two main ways in which we collect your personal data:

  1. Directly from you; and
  2. From third parties (e.g. our Candidates and other limited sources (e.g. online and offline media).

- If you would like to know more about how we collect your personal data, please see **LONG FORM SECTION - HOW DO WE COLLECT 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 see **LONG FORM SECTION – WEBSITE USERS**.

- **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 see **LONG FORM SECTION – WEBSITE USERS**

- **PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:** We collect your contact details only where a candidate or a member of our staff confirms you are their emergency contact or where a Candidate provides your contact information in order for you to serve as a referee.

- **WEBSITE USERS:** 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 see **LONG FORM SECTION -WHAT ARE COOKIES AND HOW DO WE USE THEM**.

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.

- For more details on how we use your personal data, please see below under **LONG FORM SECTION – CANDIDATE DATA**.

- **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: (i) identifying Candidates who we think will be the right fit for you or your organisation; (ii) providing you with an MSP (Managed Service Provider Service) (or assisting another organisation to do so); and/or (iii) providing you with RPO Services (or assisting another organisation to do so). The more information we have, the more bespoke we can make our service.

- For more details on how we use your personal data, please see **LONG FORM SECTION – CLIENT DATA**.

- **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.

- For more details on how we use your personal data, please see **LONG FORM SECTION – SUPPLIER DATA**.

- **PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:** We use referees' personal data to help our Candidates to find employment which is suited to them. If we are able to verify their details and qualifications, we can make sure that they are well matched with prospective employers. We may also use referees' personal data to contact them in relation to recruitment activities that may be of interest to them. We use the personal details of a Candidate or Staff member's emergency contacts in the case of an accident or emergency affecting that Candidate or member of Staff.

- For more details on how we use your personal data, please see **LONG FORM - PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS.**

- **WEBSITE USERS:** 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.

- Please note that communications to and from 1st Recruitment 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 may share your personal data with various parties, in various ways and for various reasons. Primarily we will share your information with prospective employers to increase your chances of securing a job or previous employers to obtain references.

- If you would like to see a list of who we may share your personal data with, please see below under **LONG FORM SECTION - WHO DO WE SHARE YOUR PERSONAL DATA WITH**?

- **CLIENT DATA:** We will share your data: (i) primarily to ensure that we provide you with a suitable pool of Candidates; (ii) to provide you with an MSP programme (or assist another organisation to do so); and/or (iii) to provide you with RPO services (or assist another organisation to do so). Unless you specify otherwise, we may share your information with any of our group companies and associated third parties such as our service providers to help us meet these aims.

- If you would like to see a list of who we may share your personal data with, please see below under **LONG FORM SECTION WHO DO WE SHARE YOUR PERSONAL DATA WITH**?

- **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.

- If you would like to see a list of who we may share your personal data with, please see below under **LONG FORM SECTION - WHO DO WE SHARE YOUR PERSONAL DATA WITH**?

- **PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:** 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.

- If you would like to see a list of who we may share your personal data with, please see below under **LONG FORM SECTION - WHO DO WE SHARE YOUR PERSONAL DATA WITH**?

- **WEBSITE USERS**: Unless you specify otherwise, we may share your information with providers of web analytics services, marketing automation platforms and social media services to make sure any advertising you receive is targeted to you.

How do we safeguard your personal data?

- We care about protecting your information. That's why we put in place appropriate measures that are designed to prevent unauthorised access to, and misuse of, your personal data. For more information on the procedures we put in place, please see below **LONG FORM SECTION - HOW DO WE SAFEGUARD YOUR PERSONAL DATA**.

How long do we keep your personal data for?

- If we have not had meaningful contact with you (or, where appropriate, the company you are working for or with) for a period of three years, we will delete your personal data from our systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to Client Terms of Business Clauses or tax authorities or in connection with any anticipated litigation).

- For more information on our policy for the retention of personal data, please see below under **LONG FORM SECTION - HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR**.

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 at customerservice@1strecruit.co.uk . 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 to any of these activities (such as job alerts) at any time by contacting us at customerservice@1strecruit.co.uk to withdraw consent to any or all of our services.

- **Data Subject Access Requests (DSAR):** You have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or delete such information. At this point we may comply with your request or, additionally do one of the following:
  - We may ask you to verify your identity, or ask for more information about your request; and

  - Where we are legally permitted to do so, we may decline your request, but we will explain why if we do so.

- **Right to erasure:** In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to "erase" your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If we do agree to your request, we will archive your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. That way, we will minimise the chances of you being contacted in the future where your data is collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.

- **Right of data portability:** If you wish, you have the right to transfer your data from us to another data controller. We will help with this – either by directly transferring your data for you, or by providing you with a copy I n a commonly used machine – Readable format.

- **Right to lodge a complaint with a supervisory authority:** You also have the right to lodge a complaint with your local supervisory authority, details of which can be found below under **LONG FORM SECTION - RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY.**

- If your interests or requirements change, you can unsubscribe from part or all of our marketing content (for example job role emails) by clicking the unsubscribe link in the job alert email, or by updating your preferences through your Log IN on the 1st Recruitment website (by signing into your account using your user name and password. If you have forgotten your password please contact us at customerservice@1strecruit.co.uk so we can deactivate your website account to receive future job alerts from our website.

- If you would like to know more about your rights in respect of the personal data we hold about you, please see below **LONG FORM SECTION - HOW CAN YOU ACCESS, AMEND OR TAKE BACK THE PERSONAL DATA THAT YOU HAVE GIVEN TO US?**

How do we store and transfer your data internationally?

- 1st Recruitment has companies in Jersey, Guernsey and Australia – this is what enables us to offer the level of services that we do. In order for us to continue operating in this way, at your request we may have to transfer or store your data across the countries we operate.

- For more information on the steps we take when we transfer and s tore your data internationally, please see **LONG FORM SECTION - How do we store and transfer your data internationally**

Who is responsible for processing your personal data on the 1st Recruitment website?

- 1st Recruitment controls the processing of personal data on its website.

If you've got any further questions, or want further details, please see below . **LONG FORM SECTION - Who is responsible for processing your personal data on the 1st Recruitment website.**

What are cookies and how do we use them?

- A "cookie" is a bite-sized piece of data that is stored on your computer's hard drive. They are used by nearly all websites and do not harm your system. We use them to track your activity to help ensure you get the smoothest possible experience when visiting our website. We can use the information from cookies to ensure we present you with options tailored to your preferences on your next visit. We can also use cookies to analyse traffic and for advertising purposes.

- If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.

- If you want to find out more about cookies, including how we use them and what choices are available, please see below **WHAT ARE COOKIES AND HOW DO WE USE THEM.**

How to reject cookies

- If you don’t want to receive cookies that are not strictly necessary to perform basic features of our site, you may choose to opt-out by changing your browser settings

- Most web browsers will accept cookies but if you would rather we didn’t collect data in this way you can choose to accept all or some, or reject cookies in your browser's privacy settings. However, rejecting all cookies means that you may not be able to take full advantage of all our website's features. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

- For more information generally on cookies, including how to disable them, please refer to aboutcookies.org. You will also find details on how to delete cookies from your computer.

LONG FORM DETAILED SECTIONS

WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT?

Here is a more detailed look at the information we may collect. The information described below is, of course, in addition to any personal data we are required by law to process in any given situation.

- **CANDIDATE DATA**: Depending on the relevant circumstances and applicable local laws and requirements, we may collect some or all of the information listed below to enable us to offer you employment opportunities which are tailored to your circumstances and your interests. In some jurisdictions, we are restricted from processing some of the data outlined below. In such cases, we will not process the data in those jurisdictions:

  - Name;

  - Age/date of birth;

  - Sex/gender;

  - Photograph;

  - Marital status;

  - Contact details;

  - Education details;

  - Employment history;

- Emergency contacts and details of any dependents;

- Referee details;

- Right to Work/Immigration status (whether you need a work permit);

- Nationality/citizenship/place of birth;

- A copy of your driving license and/or passport/identity card;

- Financial information (where we need to carry out financial background checks);

- Social security number (or equivalent in your country) and any other tax-related information;

- Bank Details if we are paying you as a temporary worker or contractor employed by 1st Recruitment

- Diversity information including racial or ethnic origin, religious or other similar beliefs, and physical or mental health, including disability-related information;

- Details of any criminal convictions if this is required for a role that you are interested in applying for;

- Details about your current remuneration, pensions and benefits arrangements;

- Information on your interests and needs regarding future employment, both collected directly and inferred, for example from jobs viewed or articles read on our website;

- Extra information that you choose to tell us;

- Extra information that your referees chooses to tell us about you;

- Extra information that our Clients may tell us about you, or that we find from other third party sources such as job sites;

- IP address;

- The dates, times and frequency with which you access our services; and

- Please note that the above list of categories of personal data we may collect is not exhaustive.

- 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 see **WEBSITE USERS.**

- **CLIENT DATA:** The data we collect about Clients is actually very limited. We generally only need to have your contact details or the details of individual contacts at your organisation (such as their names, telephone numbers and email addresses) to

enable us to ensure that our relationship runs smoothly. We also hold information relating to your vacancies, remuneration packages, policies regarding new employees and online engagement with candidate profiles. We may also hold extra information that someone in your organisation has chosen to tell us. In certain circumstances, such as when you engage with our Finance and Debt Recovery teams, our calls with you may be noted, depending on the applicable local laws and requirements. If we need any additional personal data for any reason, we will let you know.

- 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 see **WEBSITE USERS**.

- **SUPPLIER DATA:** We don't collect much data about Suppliers - we simply need to make sure that our relationship runs smoothly. We will collect the details for our contacts within your organisation, such as names, telephone numbers and email addresses. We will also collect bank details, so that we can pay you. We may also hold extra information that someone in your organisation has chosen to tell us. In certain circumstances, such as when you engage with our Finance and Debt Recovery teams, our calls with you may be recorded, depending on the applicable local laws & requirements.

- 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 see **WEBSITE USERS**.

DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS: All we need from referees is confirmation of Employment Dates to comply with our pre screening requirements. Emergency contact details confirm details of who to call in an emergency. To ask for a reference, we'll obviously need the referee's contact details (such as name, email address and telephone number). We'll also need these details if our Candidate or a member of our Staff has confirmed your name as their emergency contact so that we can contact you in the event of an accident or an emergency.

- **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 how you use our website, the frequency with which you access our website, your browser type, the location you view our website from, the language you choose to view it in and the times that our website is most popular. If you contact us via the website, for example by using the contact us function, we will collect any information that you provide to us, for example your name, contact details and CV information you have provided.

- If you would like to find out more information about what data we collect about you when you visit our website, please see **WEBSITE USERS**.

HOW DO WE COLLECT YOUR PERSONAL DATA?

- **CANDIDATE DATA:** We collect Candidate personal data in three primary ways:

  1. Personal data that you, the Candidate, gives to us;

  2. Personal data that we receive from other sources; and

  3. Personal data that we collect automatically.

  Personal data you give to us

  1st Recruitment needs to know certain information about you in order to provide a tailored service. This will enable us to provide you with the best opportunities, and should save you time in not having to trawl through information about jobs and services that are not relevant to you.

  There are numerous ways you can share your information with us. It all depends on what suits you. These may include:

  - Entering your details on the 1st Recruitment website or via an application form, as part of the registration process;

  - Leaving a hard copy CV at a 1st Recruitment event, job fair or office;

  - Emailing your CV to a 1st Recruitment consultant or being interviewed by them;

  - Applying for jobs through a job aggregator such as the JEP which then redirects you to the 1st Recruitment website;

  - Entering your personal details into a 1st Recruitment APP or microsite; or

  - Entering a competition through a social media channel.

  Personal data we receive from other sources

  We also receive personal data about Candidates from other sources. Depending on the relevant circumstances and applicable local laws and requirements, these may include personal data received in the following situations:

  - Your referees may disclose personal information about you;

  - Our Clients may share personal information about you with us;

  - We may obtain information about you from searching for potential Candidates from third party sources, such as LinkedIn and other job sites;

  - If you 'like' our page on Facebook or 'follow' us on Twitter we will receive your personal information from those sites; and

- If you were referred to us through an RPO (Recruitment Process Outsourcer) or an MSP (Managed Service Provider) supplier, they may share personal information about you with us.

Personal data we collect automatically

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us. For more information please see **PERSONAL DATA WE COLLECT AUTOMATICALLY.**

- **CLIENT DATA** We collect Client personal data in three ways:

  1. Personal data that we receive directly from you;

  2. Personal data that we receive from other sources; and

  3. Personal data that we collect automatically.

Personal data that we receive directly from you

- We both share the same goal – to make sure that you have the best staff for your organisation. We will receive data directly from you in two ways:

  - Where you contact us proactively, usually by phone or email; and/or

  - Where we contact you, either by phone or email, or through our consultants' business development activities more generally.

Personal data we receive from other sources

- Where appropriate and in accordance with any local laws and requirements, we may seek more information about you or your colleagues from other sources generally by way of due diligence or other market intelligence including:

  - From third party market research and by analysing online and offline media (which we may do ourselves, or employ other organisations to do for us);

  - From delegate lists at relevant events; and

  - From other limited sources and third parties (for example from our Candidates to the extent that they provide us with your details to act as a referee for them).

Personal data we collect via our website

- To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us. For more information please see Personal Data we collect via our Website.

- **WEBSITE USERS:** When you visit our website there is certain information that we may automatically collect, whether or not you decide to use our services. This includes your IP address, the date and the times and frequency with which you access the website and the way you browse its content. We will also collect data from you when you contact us via the website, for example by using the chat function.

- We collect your data automatically via cookies, in line with cookie settings in your browser. If you are also a Candidate or Client of 1st Recruitment, we may use data from your use of our websites to enhance other aspects of our communications with or service to you.

HOW DO WE USE YOUR PERSONAL DATA?

Having obtained data about you, we then use it in a number of ways.

CANDIDATE DATA: We generally use Candidate data in four ways:

- Recruitment Activities

- Marketing Activities

- Equal Opportunities Monitoring

and

- To assist with any legal requirements

Here are some more details about each:

Recruitment Activities

Obviously, our main area of work is recruitment – connecting the right Candidates with the right jobs. We've listed below various ways in which we may use and process your personal data for this purpose, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive.

- Collecting your data from you and other sources, such as LinkedIn;

- Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to recruitment;

- Providing you with our recruitment services and to facilitate the recruitment process;

- Assessing data about you against vacancies which we think may be suitable for you;

- Sending your information to Clients, in order to apply for jobs or to assess your eligibility for jobs;

- Enabling you to submit your CV, apply online for jobs or to subscribe to alerts about jobs we think may be of interest to you;

- Allowing you to participate in specialist online training;

- Allowing you to participate in the interactive features of our services, when you choose to do so;

- Carrying out our obligations arising from any contracts entered into between us;

- Carrying out our obligations arising from any contracts entered into between 1st Recruitment and third parties in relation to your recruitment;

- Facilitating our payroll and invoicing processes;

- Carrying out customer satisfaction surveys;

- Verifying details you have provided, using third party resources (such as psychometric evaluations or skills tests), or to request information (such as references, qualifications and potentially any criminal convictions, to the extent that this is appropriate and in accordance with local laws);

- Complying with our legal obligations in connection with the detection of crime or the collection of taxes or duties; and

- Processing your data to enable us to send you targeted, relevant marketing materials or other communications which we think are likely to be of interest to you.

Marketing Activities

We may periodically send you information that we think you may find interesting, or to ask for your help with connecting other Candidates with jobs. In particular, we may wish to use your data for the purposes listed below, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive. To:

- enable us to develop and market other products and services;

- market our full range of recruitment services (permanent, temporary, contract, outplacement, Managed Service Provider and Pre Screening Services) to you;

- send you details of reports, promotions, offers, networking and client events, and general information about the industry sectors which we think might be of interest to you;

- provide you with information about certain discounts and offers that you are eligible for by virtue of your relationship with 1st Recruitment.

If you are not happy about our approach to marketing, you have the right to withdraw your consent at any time. Please contact customerservice@1strecruit.co.uk

All our marketing is based on what we think will serve our Clients and Candidates best, but we know we won't always get it right for everyone. We may use your data to show you 1st Recruitment adverts and other content on other websites, for example Facebook. If you do not want us to use your data in this way, please turn off the "Advertising Cookies" option in your browser. Even where you have turned off advertising cookies, it is still possible that you may see a 1st Recruitment advert, but in this case it won't have been targeted at you personally, but rather at an anonymous audience.

Equal opportunities monitoring and other sensitive personal data

We are committed to ensuring that our recruitment processes are aligned with our approach to equal opportunities. Some of the data we may (in appropriate circumstances and in accordance with local law and requirements) collect about you comes under the umbrella of "diversity information". This could be information about your ethnic background, gender, disability, age, sexual orientation, religion or other similar beliefs, and/or social-economic background. Where appropriate and in accordance with local laws and requirements, we'll use this information on an anonymised basis to monitor our compliance with our equal opportunities policy. We may also disclose this (suitably anonymised where relevant) data to Clients where this is contractually required or the Client specifically requests such information to enable them to comply with their own employment processes.

This information is what is called 'sensitive' personal information and slightly stricter data protection rules apply to it. We therefore need to obtain your consent before we can use it. We'll ask for your consent by offering you an opt-in by ticking this box during the Registration Process when registering. This means that you have to explicitly and clearly tell us that you agree to us collecting and using this information.

We may collect other sensitive personal data about you, such as health-related information, religious affiliation, or details of any criminal convictions if this is appropriate in accordance with local laws and is required for a role that you are interested in applying for.

If you are not happy about this, you have the right to withdraw your consent at any time by contacting us at customerservice@1strecruit.co.uk

To help us to establish, exercise or defend legal claims

In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

CLIENT DATA: We use Client information for:

- Recruitment Activities;

- Marketing Activities; and

- To help us to establish, exercise or defend legal claims.

Here are some more details about each:

Recruitment Activities

Our main area of work is recruitment, through: (i) providing you with Candidates; (ii) RPO services ; and (iii) MSP programmes. We've listed below the various ways in which we use your data in order to facilitate this.

- Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to recruitment activities;

- Keeping records of our conversations and meetings, so that we can provide targeted services to you;

- Undertaking customer satisfaction surveys; and

- Processing your data for the purpose of targeting appropriate marketing campaigns.

If you are not happy about this, in certain circumstances you have the right to object.

Marketing Activities

Subject to any applicable local laws and requirements, we will not, as a matter of course, seek your consent when sending marketing materials about our services to a corporate postal or email address.

If you are not happy about this, you have the right to opt out of receiving marketing materials from us by contacting us on customerservice@1strecruit.co.uk

Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding marketing activities.

To help us to establish, exercise or defend legal claims

In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

SUPPLIER DATA:

We will only use your information for:

- To store (and update when necessary) your details on our database, so that we can contact you in relation to our agreements;

- To offer services to you or to obtain support and services from you;

- To perform certain legal obligations;

- To help us to target appropriate marketing campaigns; and

- In more unusual circumstances, to help us to establish, exercise or defend legal claims.

We will not, as a matter of course, seek your consent when sending marketing messages about our services to a corporate postal or email address.

If you are not happy about this, you have the right to object by emailing customerservices@1strecruit.co.uk

PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS: We will only use the information that our Candidate gives us about you for the following purposes:

- If our Candidates or Staff members put you down on our form as an emergency contact, we'll contact you in the case of an accident or emergency affecting them; or

- If you were put down by our Candidate or a prospective member of Staff as a referee, we will contact you in order to take up a reference. This is an important part of our Candidate Pre Screening process-

If you were confirmed by our Candidate or a prospective member of Staff as a referee, we may sometimes use your details to contact you in relation to recruitment activities that we think may be of interest to you, in which case we will use your data for the same purposes for which we use the data of Clients

- If you are not happy about this, you have the right to object by contacting customerservice@1strecruit.co.uk

- **WEBSITE USERS:** 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 or Candidates to you that we think you'll be interested in.

WHO DO WE SHARE YOUR PERSONAL DATA WITH?

- Where appropriate and in accordance with local laws and requirements, we may share your personal data, in various ways and for various reasons, with the following categories of people:

  - Any of our group companies with your prior consent;

  - Individuals and organisations who hold information related to your reference or application to work with us, such as current, past or prospective employers, educators and examining bodies and employment and recruitment agencies;

  - Tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this data (for example, because of a request by a tax or social security authority or in connection with any anticipated litigation);

  - Third party service providers who perform functions on our behalf (including external consultants, business associates and professional advisers such as lawyers, auditors and accountants, technical support functions and IT consultants carrying out testing and development work on our business technology systems);

  - Third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place;

  - Marketing technology platforms and suppliers;

  - In the case of Candidates: potential employers and other recruitment agencies/organisations to increase your chances of finding employment;

  - In the case of Candidates: third party partners, job boards and job aggregators where we consider this will improve the chances of finding you the right job;

  - In the case of Candidates: MSP suppliers as part of our clients' MSP programmes;

  - In the case of Candidates and our Candidates' and prospective members of Staff's referees: third parties who we have retained to provide services such as reference, qualification and criminal convictions checks, to the extent that these checks are appropriate and in accordance with local laws;

- If 1st Recruitment merges with or is acquired by another business or company in the future, (or is in meaningful discussions about such a possibility) we may share your personal data with the (prospective) new owners of the business or company.

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 by contacting customerservice@1strecruit.co.uk

HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

- We will delete your 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 three 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. If we secure you a new role we will hold your personal data for as long as is necessary to comply with our statutory and clients contractual obligations and in accordance with our legitimate interests as a data controller.

- 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 three years from that point or, if later, for the period of three 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.

- Once we have deleted your personal data we will no longer hold this data and you will therefore be unable to exercise your rights of access, erasure, rectification and data portability after this time.

HOW CAN YOU ACCESS, AMEND OR TAKE BACK THE PERSONAL DATA THAT YOU HAVE GIVEN TO US?

- One of the GDPR's main objectives is to protect and clarify the rights of EU citizens and individuals in the EU with regards to data privacy. This means that you retain various rights in respect of your data, even once you have given it to us. These are described in more detail below.

- To get in touch about these rights, please contact us at customerservice@1strecruit.co.uk We will seek to deal with your request without undue delay, and in any event within one month (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues which you raise.

- **Right to object:** this right enables you to object to us processing your personal data where we do so for one of the following four reasons: (i) our legitimate interests; (ii) to enable us to perform a task in the public interest or exercise official authority; iii) to send you direct marketing materials; and (iv) for scientific, historical, research, or statistical purposes.

- The "legitimate interests" and "direct marketing" categories above are the ones most likely to apply to our Website Users, Candidates, Clients and Suppliers and. If your objection relates to us processing your personal data because we deem it necessary for your legitimate interests, we must act on your objection by ceasing the activity in question unless:

  - we can show that we have compelling legitimate grounds for processing which overrides your interests; or

  - we are processing your data for the establishment, exercise or defence of a legal claim.

- If your objection relates to direct marketing, we must act on your objection by ceasing this activity.

- **Right to withdraw consent:** Where we have obtained your consent to process your personal data for certain activities (for example, for our marketing arrangements, you may withdraw this consent at any time and we will cease to carry out the particular activity that you previously consented to unless we consider that there is an alternative reason to justify our continued processing of your data for this purpose in which case we will inform you of this condition.

- **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, archive 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 apply an administration charge where legally permissible. If you request further copies of this information from us, we may charge you an extra administrative cost. 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 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 contact us at customerservice@1strecruit.co.uk

- **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. For more information in relation to your jurisdiction, please contact customerservice@1strecruit.co.uk.

  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 data 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. Details of how to contact them can be found below.

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), please contact customerservice@1strecruit.co,uk Please note that we may keep a record of your communications to help us resolve any issues which you may raise.

You may ask to unsubscribe from job alerts at any time by emailing customerservice@1strecruit.co.uk and requesting this action or selecting the 'Opt out' under your account details on our website or 'unsubscribe' on any job alert email.

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

WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA ON THE 1st RECRUITMENT WEBSITE?

- 1st Recruitment

- **HOW DO WE STORE AND TRANSFER YOUR DATA INTERNATIONALLY?**

- In order to provide you with the best service and to carry out the purposes described in this Privacy Policy, your data may be transferred:

- between and within 1st Recruitment entities;

- to third parties (such as Recruitment Outsourced Providers or other Suppliers to services such as Pre Employment Screening Companies to 1st Recruitment);

- to international Clients at your request;

- to a cloud-based storage provider; and

- to other third parties,which enable 1st Recruimtnent to carry out our services as a Recruitment Agency. For more details contact customerservices@1strecruit.co.uk.

- We want to make sure that your data is stored and transferred in a way which is secure. We will therefore only transfer data outside of the European Economic Area or EEA (i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein) where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, for example:

  - by way of data transfer agreement, 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; or

  - by signing up to the EU-U.S. Privacy Shield Framework for the transfer of personal data from entities in the EU to entities in the United States of America or any equivalent agreement in respect of other jurisdictions; or

  - transferring your data to a country where there has been a finding of adequacy by the European Commission in respect of that country's levels of data protection via its legislation; or

  - where it is necessary for the conclusion or performance of a contract between ourselves and a third party and the transfer is in your interests for the purposes of that contract (for example, if we need to transfer data outside the EEA in order to meet our obligations under that contract if you are a candidate or client of ours); and where you have consented to the data transfer.

  To ensure that your personal information receives an adequate level of protection, we have put in place appropriate procedures with the third parties 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 and which respects the law on data protection.

COOKIES POLICY

What's a cookie?

- A "cookie" is a piece of information that is stored on your computer's hard drive and which records your navigation of a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes.

- Cookies are used by nearly all websites and do not harm your system. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.

How do we use cookies?

- We use cookies to do two things:

  - to track your use of our website. This enables us to understand how you use the site and track any patterns that emerge individually or from larger groups. This helps us to develop and improve our website and services in response to what our visitors want and need; and

  - to help us advertise jobs to you that we think you'll be interested in. Hopefully this means less time for you trawling through endless pages and will get you to the opportunities you want more quickly.

- Cookies are either:

  - Session cookies: these are only stored on your computer during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any information from your computer; or

  - Persistent cookies: a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again. We use persistent cookies for Google Analytics

- Cookies can also be categorised as follows:

  - Strictly necessary cookies: These cookies are essential to enable you to use the website effectively, such as when applying for a job, and therefore cannot be turned off. Without these cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.

  - Performance cookies: These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.

  - Functionality cookies: These cookies allow our website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customise. They may

also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymised.

- Personalisation cookies: These cookies help us to advertise details of potential job opportunities that we think may be of interest. These cookies are persistent (for as long as you are registered with us) and mean that when you log in or return to the website, you may see advertising for jobs that are similar to jobs that you have previously browsed.

OUR LEGAL BASES FOR PROCESSING YOUR DATA

LEGITIMATE INTERESTS

We can process your data where it "is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data." ! However, you do have the right to object to us processing your personal data on this basis. If you would like to know more email customerservice@1strecruit.co.uk

Please note that in certain jurisdictions in which we operate, a different legal basis for data processing might apply in certain cases. For more information contact customerservice@1strecruit.co.uk

LEGITIMATE INTERESTS

CANDIDATE DATA:

We think it's reasonable to expect that if you are looking for employment or have posted your professional CV information on a job board or professional networking site, you are happy for us to collect and otherwise use your personal data to offer or provide our recruitment services to you, share that information with prospective employers with your consent and assess your skills against our bank of vacancies. Your prospective employer may also want to double check any information you've given us (such as the results from psychometric evaluations or skills tests) or to confirm your references, qualifications and criminal record, to the extent that this is appropriate and in accordance with local laws.

We want to provide you with tailored job recommendations and relevant articles to read to help you on your job hunt. We therefore think it's reasonable for us to process your data to make sure that we send you the most appropriate content.

We have to make sure our business operation runs smoothly, so that we can carry on providing services to candidates. We therefore also need to use your data for our internal administrative activities, such as payroll and invoicing where relevant.

We have our own obligations under the law, which it is a legitimate interest of ours to insist on keeping your data up to date and keeping in touch with you.

If we believe in good faith that it is necessary, we may also share your data in connection with crime detection, tax or social security collection or actual or anticipated litigation.

CLIENT DATA:

To ensure that we provide you with the best service possible, we store your personal data and/or the personal data of individual contacts at your organisation as well as keeping records of our conversations, meetings, registered jobs and placements. From time to time, we may also ask you to undertake a customer satisfaction survey. We think this is reasonable – we deem these uses of your data to be necessary for our legitimate interests as an organisation providing various recruitment services to you.

SUPPLIER DATA:

We use and store the personal data of individuals within your organisation in order to facilitate the receipt of services from you as one of our Suppliers. We also hold your financial details, so that we can pay you for your services. We deem all such activities to be necessary within the range of our legitimate interests as a recipient of your services.

DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:

If you have been confirmed by a candidate or a prospective member of staff as one of their referees, we use your personal data in order to contact you for a reference. This is a part of our Pre Employment Screening quality assurance procedure and so we deem this to be necessary for our legitimate interests as an organisation offering recruitment services and employing people ourselves.

- If a Candidate or Staff member has given us your details as an emergency contact, we will use these details to contact you in the case of an accident or emergency. We are sure you will agree that this is a vital element of our people-orientated organisation, and so is necessary for our legitimate interests.

CONSENT

- In certain circumstances, we are required to obtain your consent to the processing of your personal data in relation to certain activities. Depending on exactly what we are doing with your information, this consent will be an opt-in consent.

- Opt-in consent is 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. This means that:

- you have to give us your consent freely, without us putting you under any type of pressure;

- you have to know what you are consenting to – so we'll make sure we give you enough information;

- you should have control over which processing activities you consent to and which you don't. We provide these options during or after the Registration Process; and

- you need to take positive and affirmative action in giving us your consent – we're likely to provide a tick box for you to check so that this requirement is met in a clear and unambiguous fashion.

We will keep records of the consents that you have given in this way.

- Please note that in certain jurisdictions in which we operate, we comply with additional local law requirements regarding consenting to receive marketing materials. For more information in relation to this contact customerservice@1strecruit.co.uk

- You have the right to withdraw your consent to these activities. You can do so at any time by emailing customerservice@1strecruit.co.uk

ESTABLISHING, EXERCISING OR DEFENDING LEGAL CLAIMS

- Sometimes it may be necessary for us to process personal data and, where appropriate and in accordance with local laws and requirements, sensitive personal data in connection with exercising or defending legal claims. GDPR allows this where the processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity. This may arise for example where we need to take legal advice in relation to legal proceedings or are required by law to preserve or disclose certain information as part of the legal process.

HOW TO CONTACT US

1st Recruitment, 2nd Floor, Unity House, St Helier, Jersey, JE2 4WG

Email: customerservice@1strecruit.co.uk

Telephone: 01534 875444

You can get in touch with us for

- to access, amend or take back the personal data that you have given to us;

- **if you suspect any misuse or loss of or unauthorised access to your personal information;**
- **to withdraw your consent to the processing of your personal data (where consent is the legal basis on which we process your personal data);**
- **With any comments or suggestions concerning this Privacy Policy**

You can get in touch with us to update your marketing preferences

- **You can do this by updating your account profile on our website using your user name and password.**
- Alternatively you can email us at: customerservice@1strecruit.co.uk or by clicking the unsubscribe link in any marketing e-mail we send to you

HOW TO CONTACT YOUR LOCAL SUPERVISORY AUTHORITY

Details of your local supervisory authority:

Office of the Information Commissioner, 2nd Floor, 5 Castle Street, St Helier, Jersey, JE2 3BT

- Phone: +(44)1534 716530
- Email: enquiries@oicjersey.org
- Website:www.oicjersey.org