

February 2020/ Version 9

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The purpose of this Privacy Notice is to tell you what Personal Information the Impellam Group company (the “**Company**”), acting as a controller and as listed in **Annex A**, collects from you or other sources, how and when it may be collected and what happens to it. The Impellam Group company which was originally responsible for collecting your Personal Data will be responsible for your Personal Data as controller. For example, if you are a Supplier or an Employee and have a contract with us, it will be the Impellam Group company named on that contract.

For the purpose of this Privacy Notice, “**we**”, “**our**” and “**us**” refers to the Company. It applies to the Personal Data of our Candidates, Suppliers, Clients, Website Users and Employees (see below for further explanation of these terms). It also applies to third parties whose Personal Information you provide to us in connection with our relationship with you (for example, in respect of references). Please ensure that you provide a copy of this Privacy Notice to any third parties whose Personal Data you provide to us.

Personal Data is any personally identifiable information, such as your email address, name, home or work address, telephone number, bank details or tax codes, which can directly or indirectly identify you. We refer to it as “Personal Data Information” here.

1 What information might we collect about you?

When you interact with us in the different ways described below, we may process the following information:

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| Candidates | <ul style="list-style-type: none"> ➤ personal and contact details (for example your name, email address, date of birth, gender); ➤ personal and contact details you give us when subscribing to receive emails, newsletters or marketing information from us; ➤ during pre-assignment vetting we will request details from you including, your name, your work history, qualifications, contact details (such as email, telephone number and home address), your right to work documents, details required for equality and discrimination legislation checks and your personal preferences, choices and requirements specific to particular requests or services; ➤ details of your education, employment history, bank details and PPSN, references, right to work and other information you tell us about yourself (e.g. the information contained within your CV) when you engage with us for the provision of services; ➤ information from social media activity (such as likes, shares and tweets) when you interact with us on social media; ➤ additional information which you provide voluntarily and/or which we may ask from you to better understand you and your interests; ➤ CCTV recordings at any Impellam Group company site or as provided to us by the client from CCTV recordings at the client site. <p>We may also collect Special Category Personal Data about you (including details of your physical or mental health, racial or ethnic origin, criminal allegations or offences, trade union membership and/or other Special Category Personal Data that you may choose to provide to us voluntarily from time to time.</p> |
| Suppliers | <ul style="list-style-type: none"> ➤ contact details to enable the provision of your services to us and the fulfillment of our contract obligations, this may include names, email addresses and telephone numbers; ➤ bank details and any other details required to enable payment for the services supplied. |
| Clients | <ul style="list-style-type: none"> ➤ contact details or those of individuals at your organisation (such as names, telephone numbers and email addresses) to enable the provision of services and to facilitate our relationship with you, including relevant marketing. |
| Website Users | <ul style="list-style-type: none"> ➤ information we collect via cookies or similar technology stored on your device (find out more about cookies and how we use them in our Cookie Policy; ➤ your IP address; ➤ information from social media activity (such as likes, shares and tweets) when you interact with us on social media; ➤ information you provide if you report a problem with our website or service; ➤ additional information which you provide voluntarily and/or which we may ask from you to better understand you and your interests. |
| Employees | <ul style="list-style-type: none"> ➤ personal and contact details (for example your name, email address, date of birth, gender); ➤ personal and contact details of your emergency contact and referees; ➤ during pre-employment vetting we will request details from you including, your name, your work history, qualifications, contact details (such as email, telephone number and home address), your right to work documents, details required for equality and discrimination legislation checks and your personal preferences, choices and requirements specific to particular requests or services; |

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| | <ul style="list-style-type: none"> ➤ details of your education, employment history, bank details and PPSN, references, right to work and other information you tell us about yourself (e.g. the information contained within your CV); ➤ information from social media activity (such as likes, shares and tweets) when you interact with us on social media; ➤ additional information which you provide voluntarily and/or which we may ask from you to better understand you and your interests ➤ CCTV recordings at any Impellam Group company site or as provided to us by the client from CCTV recordings at the client site. <p>We may also collect Special category Personal Data about you (including details of your physical or mental health, racial or ethnic origin, criminal allegations or offences, trade union membership and/or other Special Category Personal Data that you may choose to provide to us voluntarily from time to time.</p> |
| Referees and Emergency Contacts | <ul style="list-style-type: none"> ➤ We require a referee's contact details (name, email address and telephone number) to enable us to confirm certain details provided by the Candidate or prospective employee, to facilitate the employment process. ➤ Emergency contact information (a name, email address and telephone number) is required in case of an emergency where we would need to contact someone on your behalf. |

2 How, when and why do we collect your Personal Data?

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| Candidates | <ul style="list-style-type: none"> ■ How and when do we collect your Personal Data? We may collect your Personal Data when you apply for a role through us (or otherwise contact us from time to time) by: <ul style="list-style-type: none"> ➤ you responding to an advert on a job board or other website; ➤ by you directly contacting our business, ➤ by you filling in an application form in a branch; ➤ when you speak to one of our consultants by telephone; or ➤ another agency or organisation passes your details to us. ■ Why do we collect your Personal Data? We collect and use your Personal Data because it is necessary to obtain certain details including Personal Data from you in the work-searching process and it is in our legitimate interests in the course of operating our business, including: <ul style="list-style-type: none"> ➤ responding to your queries; ➤ providing work-finding services and/or information to you; ➤ transmitting Personal Data between our offices or functions for internal administrative purposes; ➤ setting you up on a work assignment with a client; ➤ hosting and maintaining our websites; ➤ ensuring network and information security; and/or ➤ carrying out direct marketing. <p>Legal Basis. However we will only collect, use and handle your Personal Data when:</p> <ul style="list-style-type: none"> ➤ it is necessary for our legitimate interests in connection with carrying out our business (including legal, personnel, administrative and management purposes), as long as, in each case, such interests are not overridden by your interests and rights; and/or ➤ where you have consented, where such consent may be withdrawn at any time; and/or ➤ where it is necessary for us to comply with legal and regulatory obligations. |
| Employees | <ul style="list-style-type: none"> ■ How and when do we collect your Personal Data? We collect your Personal Data when you come to work with us from: <ul style="list-style-type: none"> ➤ your application to us; and ➤ the information you provide when you complete the necessary forms required by our Human Resources team. ■ Why do we collect your Personal Data? We collect and use your Personal Data because it is necessary to obtain certain details including Personal Data from you as part of the employee/employer relationship. Legal Basis. However we will only collect, use and handle your Personal Data when: <ul style="list-style-type: none"> ➤ it is necessary to perform a contract or enter into a contract with you; ➤ where you have consented, where such consent may be withdrawn at any time; and/or ➤ where this is necessary for us to comply with legal and regulatory obligations. |
| Suppliers & Clients | <ul style="list-style-type: none"> ■ How and when do we collect your Personal Data? We may collect your Personal Data when required in the course of our business relationship with you. ■ Why do we collect your Personal Data? |

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| | <p>We collect and use your Personal Data because it is necessary to obtain certain details including Personal Data from you:</p> <ul style="list-style-type: none"> ➤ to offer services to you or to obtain support and services from you; ➤ to perform certain legal obligations; ➤ in the performance of our contract with you; ➤ to help us to target appropriate marketing campaigns; ➤ in transmitting Personal Data between our offices or functions for internal administrative purposes; ➤ in hosting and maintaining our websites; ➤ in ensuring network and information security; and/or ➤ in carrying out direct marketing. <p>Legal Basis. However we will only collect, use and handle your Personal Data when:</p> <ul style="list-style-type: none"> ➤ it is necessary for our legitimate interests in connection with carrying out our business (including legal, personnel, administrative and management purposes), as long as, in each case, such interests are not overridden by your interests and rights; and/or ➤ where you have consented, where such consent may be withdrawn at any time; ➤ it is necessary to perform a contract or enter into a contract with you; and/or ➤ where it is necessary for us to comply with legal and regulatory obligations. |
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3 How we use the Personal Data that you provide to us

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| <p>General</p> | <p>Where necessary and appropriate for our business purposes and also in accordance with regulatory requirements, and where if required we have an appropriate processing agreement in place, we may use your Personal Data for:</p> <ul style="list-style-type: none"> • The performance of our contracts with clients and suppliers; • Third party professional advisers such as lawyers, auditors and accountants and third party service providers and consultants performing technical services for us (such as IT support functions, testing and development work and external consultants); • Where necessary in using technology systems and document storage; and • In using marketing services platforms. <p>Marketing Opt-Out: you can opt-out from receipt of marketing communication at any time free of charge by using the “unsubscribe” option included in any marketing e-mail or other marketing material received from us or by contacting optout@impellam.com.</p> <p>Website Cookies - We use cookies on our website. You can find out which cookies we use and why by viewing our Cookie Policy</p> <p>Special category Personal Data – we will only process your Special Category Personal Data where permitted by law.</p> |
| <p>Candidates</p> | <p>We undertake the following processing of your Personal Data on the legal basis that it is necessary to perform the contract with you and to provide the services we have agreed to provide to you. Where we have not entered into a contract with you, we may also carry out this processing because in that pre-contractual stage where we consider it is necessary in our legitimate business interests in order to deal with requests, enquiries or comments you have made to us provided such interests are not overridden by your interests and rights.</p> <p>Submission of details to clients - If you register to apply for a particular role, request to be put forward for a role or if you have asked us to put you forward for suitable roles, we will share some of your personal details including your name, work history and qualifications with our clients offering potential roles which might be suitable for you.</p> <p>On-boarding for a work-assignment – If you are offered and accept a work assignment through us, we will need further Personal Data from you such as PPSN, bank details, emergency contact details and some medical information in order to fulfil our statutory and contractual obligations to both you and our client.</p> <p>Reporting to clients and managing timesheets, payroll and work performance – We sometimes have to prepare reports for clients relating to the services provided by us for example reports on financial or administrative matters or compliance with legal requirements. Such reports may contain your Personal Information such as your name, hours worked and pay rate. In addition we may need to manage submission of timesheets, payroll services and other Human Resourcing services such as managing your statutory rights and work appraisals for our clients, all of which would require use of your Personal Information.</p> <p>Other lawfully permitted processing - We may also use any Personal Data that you provide to us for example to other companies within the Impellam Group or to employers or any other company who you ask us to approach on your behalf for work-searching purposes if you choose not to provide Personal Data requested by us, we may not be able to provide you with the services and/or information you have requested or otherwise fulfil the purpose(s) for which we have asked for the Personal Data, including placing you in a work-assignment. We will where possible anonymise or aggregate such data for reporting purposes.</p> <p>Pre-Assignment vetting - We undertake Pre-Assignment vetting. We collect your Personal Data which you provide to us when applying for a role or registering for our job-finding services to comply with our (and clients’) legal obligations regarding your right to work and any necessary qualifications</p> |

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| | <p>for roles. We may also process your Personal Information for this purpose where we consider it necessary for performance of the contract with you, or otherwise with your consent</p> <p>We undertake the following processing of your Personal Data with your consent.</p> <p>Marketing – where legally permitted to do so where you have provided us with your contact details and have agreed to be contacted for marketing purposes, we may contact you by telephone or by post for marketing purposes relating to our services, our website, and/or to research opinion on proposed business developments. Your agreement to the use of your Personal Information for these purposes is optional and if you fail to provide your agreement, your use of our work-finding services will not be affected.</p> <p>Special category Personal Data – will only be collected and used where permitted by law e.g. as necessary for the purposes of carrying out an obligation in the field of employment/social security/social protection law, or exercising specific rights or when the use is authorised by law or for the assessment of working capacity.</p> |
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Where you do not provide us with your Personal Data

If you do not provide us with your Personal Data, we may not be able to process your job application, or assess your suitability for a particular role, comply with our legal obligations or manage our business. We will tell you when we ask for information which is a statutory or contractual requirement or needed to comply with our legal obligations.

4 How and when do we share information with third parties?

Some services that we provide require the involvement of third parties. We have carefully selected these third parties and taken steps to ensure that your Personal Data is adequately protected. The third parties may include our clients, suppliers of IT services, pay-rolling services or vetting services.

We may also share your Personal Data where we employ third party companies or individuals to process Personal Data provided by us on our behalf for business functions, including (without limitation) IT support, hosting our data on cloud platforms, legal, accounting, audit, consulting and other professional service providers and providers of other services related to our business. Portions of our services may be provided by organisations with which we have a contractual relationship, including subcontractors, accordingly, your Personal Data may be disclosed to them. We only provide these organisations with the information that they need to be able to perform their services. We will have in place an agreement with our service providers, which will restrict how they are able to process your Personal Data.

We may also share your Personal Data where we reasonably believe that applicable law or regulation requires any Personal Data to be processed, for example with local tax authorities, immigration officials or for audit or other investigative purposes (including in connection with anticipated litigation).

Sharing within the Impellam Group and to Service Providers

The Personal Data you provide to us is collected by Impellam Group plc or one of its subsidiaries as listed at **Annex A** below. However where we are legally permitted to do so in accordance with this Privacy Notice, we may transfer your Personal Data between and to other functions or offices within the same corporate group for the purposes set out above.

International Transfers of your Personal Data

We may share your Personal Data with our subsidiaries or third party service providers based in the European Economic Area (“**EEA**”) or the United Kingdom who we engage to help us to process such information as part of our business function, and/or to host and maintain our CRM systems, content or services, on our behalf and in accordance with this Privacy Notice.

Some of our subsidiaries or external third parties are based outside the EEA so their processing of your Personal Data will involve a transfer of data outside the EEA. Whenever we transfer your Personal Information out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- the transfer is to a place that is regarded by the European Commission as providing adequate protection for your Personal Data; or
- we have put in place appropriate safeguards, for example by using a contract for the transfer which contains specific data protection provisions that have been adopted by the European Commission or a relevant data protection authority. You can request a copy of these contracts by contacting us at: GDPR@impellam.com; or
- where you have consented to it, or there is another legal basis to allow us to make the transfer.

Please contact us if you want further information on the specific mechanism used by us when transferring your Personal Data out of the EEA.

Sharing with other third parties

We may also provide your information to other third parties such as regulators and law enforcement agencies, where we are required by law to do so, where necessary for the purposes of preventing and detecting fraud, other criminal offences and/or to ensure network and information security.

5 How long do we store Personal Data for?

It is our policy to retain your Personal Information only for the length of time required for the specific purpose or purposes for which it was collected, and this is set out in **Annex B**. However, on occasion we may be obliged to store some data for a longer time, for example, where a longer time period is required by applicable laws. In this case, we will ensure that your Personal Information will continue to be treated in accordance with this Privacy Notice.

We support Candidates over many years and potentially throughout their careers and the reason for which we retain the Personal Data can be an ongoing purpose. We also work with Suppliers and Clients over long periods of time and retain Personal Data as part of these relationships. If we have not had meaningful contact with you for an extended period of time, we will delete Personal Data.

6 Security and Confidentiality

We employ appropriate security measures to help protect your Personal Data and guard against access by unauthorised persons. Information storage is on secure computers in a secure environment, or in secure, locked storage in the case of hard copy information. The information is encrypted wherever possible and we undergo periodic reviews of our security policies and procedures to ensure that our systems is secure and protected. However the transmission of information via the Internet is not completely secure so we cannot guarantee the security of your information when it is transmitted to our website or from third party websites such as job boards.

We acknowledge that the information you provide may be confidential. We do not sell, rent, distribute or otherwise make Personal Data commercially available to any third party, but we may share information with our service providers for the purposes set out in this Privacy Notice. We will keep your information confidential and protect it in accordance with our Privacy Notice and all applicable laws.

7 Your rights

It is important to us that you are in control of your own Personal Data. As a result, you have the following rights, which if you would like to exercise please contact us at GDPR@impellam.com or the address below:

1. You may request access to or a copy of the Personal Data that we hold about you;
2. If you believe that any Personal Data we have about you is incorrect or incomplete, please contact us at GDPR@impellam.com as soon as possible. We will take steps to seek to correct or update any information if we are satisfied that the information we hold is inaccurate.
3. You may request that we restrict our processing in certain circumstances;
4. You may request that your Personal Data be deleted, where it is no longer necessary for the purposes for which it is being processed and provided there is no other lawful basis for which we may continue to process such information;
5. To the extent we are processing your Personal Data to meet our legitimate interests (as set out above), you may object to the processing of your Personal Data by us. If we are unable to demonstrate our legitimate grounds for that processing, we will no longer process your Personal Data for those purposes;
6. You may object to our processing as set out above;
7. You may withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal;
8. Where we are processing your Personal Data automatically for the purposes of performing our contracts with you or based on your consent, you may have the right to request such Personal Data be transferred to a third party data controller;
9. You have the right not to be subject to a decision based on automated processing, including profiling which has legal or similar significant affects.

However, these rights may not be exercised in certain circumstances, such as when the processing of your Personal Information is necessary to comply with a legal obligation or for the exercise or defence of legal claims. If you wish to exercise any of your rights in this regard please contact the GDPR@impellam.com and we will assist you and provide you with all rights to which you are entitled in relation to your Personal Data under the applicable data protection law.

If you are unhappy with the way that we have handled your Personal Data, you can make a complaint to the Data Protection Authority, in particular in the Member State of your residence, place of work or place of an alleged infringement, if you consider that the processing of Personal Data infringes the GDPR. The Irish Data Protection Commission can be contacted at info@dataprotection.ie or alternatively please ask up on GDPR@impellam.com for assistance.

9 Contact Us

If you have any questions in relation to this Privacy Notice, or if you would like to contact us to exercise your rights as stated in this Privacy Notice, you may contact us at: GDPR@impellam.com

10 Change of Purpose

We will only use Personal Data for the purposes for which we collected it outlined in Section 2 and 3 above, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to obtain information as to how the processing for the new purpose is compatible with our original purpose, please contact us (see above).

If we need to use your Personal Data for an unrelated purpose, we will notify you and provide an explanation of the legal basis which allows us to do so. Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is permitted by applicable data protection laws.

11 Definitions

Candidates – refers to applicants (and those subsequently engaged on temporary assignments, directly or indirectly, by the Company) for any roles advertised by or through the Company, whether permanent or temporary positions, whether as freelancers, contractors, flexible employees or through third parties including Suppliers; as well as people who have submitted a speculative CV to the Company.

Employees – includes employees engaged directly by Impellam (or who have accepted an offer to be employed) as well as certain other workers engaged in the business of providing services to the Company. This includes Company employees engaged to work on client premises under the terms of managed service agreements or equivalent.

Suppliers – covers supplier companies (including sole traders), vendors, umbrella companies, partnerships and limited company contractors who provide services to the Company including as sub-contractors. Suppliers should ensure their employees and workers are made aware of the provisions of this Privacy Notice as applicable.

ANNEX A - Impellam Group Companies:

The list below is subject to amendment and update.

| European Legal Entity | Trading Name (if different) | Location |
|---|---|----------------|
| Allied Employment Group Pty Limited | | Australia |
| Allied Employment Group Pty Limited (South Africa branch) | | South Africa |
| Bartech Belgium NV | | Belgium |
| Blue Arrow Limited | | United Kingdom |
| Carbon60 AG | | Switzerland |
| Carbon60 Limited | | United Kingdom |
| Carbon60 Pty Limited | | Australia |
| Career Teachers Limited | | United Kingdom |
| Carlisle Staffing plc | Guidant Global; Tate | United Kingdom |
| Celsian Group Limited | | United Kingdom |
| Chadwick Nott (Holdings) Limited | | United Kingdom |
| Chrysalis Community Care Group Limited | | United Kingdom |
| Comensura Limited | | United Kingdom |
| Comensura Pty Limited | Comensura Australia | Australia |
| Doctors on Call Limited | | United Kingdom |
| Flexy Corporation Limited | | United Kingdom |
| Global & Medical Recruitment Consultancy Inc | | Canada |
| Global Group (UK) Limited | | United Kingdom |
| Global Medics Limited | | United Kingdom |
| Global Medics PTY Limited | | Australia |
| Global Medics NZ Limited | | New Zealand |
| Guidant Global Canada Holdings Inc | Guidant Global Canada | Canada |
| Guidant Global Europe Limited | | United Kingdom |
| Guidant Global Germany GmbH; | Guidant Global Germany | Germany |
| Guidant Global Germany GmbH (France branch) | Guidant Global France | France |
| Guidant Global Germany (Netherlands branch) | Guidant Global Netherlands | Netherlands |
| Guidant Global Germany (Norway branch) | Guidant Global Norway NUF | Norway |
| Guidant Global Germany GmbH – (Poland branch) | Guidant Global Poland | Poland |
| Guidant Global Germany GmbH – Secursal em Portugal | Guidant Global Portugal | Portugal |
| Guidant Global Italy SRL | Guidant Global Italy | Italy |
| Guidant Global Puerto Rico Inc | Guidant Global Puerto Rico | Puerto Rico |
| Guidant Global; Mexico Holdings Inc | Guidant Global Mexico | Mexico |
| Guidant Global Switzerland AG | Guidant Global Switzerland | Switzerland |
| Guidant Global SG Pte Limited | Guidant Global Singapore | Singapore |
| Healthlink New Zealand Group Limited | | New Zealand |
| Impellam GmbH | Carbon60; SRG; Lorien; onezeero; Chadwick Nott | Germany |
| Impellam Group plc | | United Kingdom |
| Impellam UK Limited | | United Kingdom |
| Irish Recruitment Consultants Limited | IRC; Guidant Global Ireland; Lorien Resourcing Ireland; SRG Ireland | Ireland |
| Latitudes Group International Management Pte Limited | | Singapore |
| Litmus Workforce Solutions Limited | | United Kingdom |
| Litmus Workforce Solutions Limited | | Ireland |
| Litmus Workforce Solutions Pty Limited | | Australia |
| Lorien Resourcing Limited | | United Kingdom |
| Medacs Global Group Limited (Ireland) | | Ireland |
| Medacs Global Group Limited | | United Kingdom |
| Medacs Healthcare Australasia Group Limited | | United Kingdom |
| Medacs Healthcare Australia Pty Limited | | Australia |

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|-----------------------------------|--------------------------|----------------|
| Medacs Healthcare Limited | | New Zealand |
| Medacs Healthcare plc | | United Kingdom |
| Medacs Healthcare Pty Limited | | Australia |
| PRN Recruitment Limited | Fast Response Healthcare | United Kingdom |
| Science Recruitment Group Limited | SRG; Synergy | United Kingdom |
| Younifi UK Limited | | United Kingdom |

ANNEX B – Retention Periods

| | Retention Period (up to) |
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| 1. <u>All Candidates</u> Candidates with whom we have had no contact | 6 months -if no contact made |
| 2. <u>All Candidates</u> Contacted but not placed | 1 year from the later of: <ul style="list-style-type: none"> • Candidate registration; • Consent to represent received (for Conduct Regs purposes) (which is separate from any consent given for data protection purposes) • Last meaningful contact. |
| 3. <u>Temporary Workers</u> Placed | 6 years from the later of: <ul style="list-style-type: none"> • End of last assignment; or • 1 year after last meaningful contact. |
| 4. <u>Permanent Workers</u> Placed | 2 years from the later of: <ul style="list-style-type: none"> • placement date; or • 1 year after last meaningful contact. |
| 5. <u>Our Own Permanent Employees or Direct Hire Temps</u> | Not hired – 1 year from registration or consent if not placed. Hire - 6 years from end of employment |
| 6. <u>All Others</u> | 6 months - If no contact made; or 2 years - from last meaningful contact. |