

Future Talent Hub

Candidate Privacy Notice

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Introduction

Future Talent Hub is a product of Amberjack Global Ltd ("Amberjack", "We", "Us", "Our", "Company"). We are committed to protecting and respecting the privacy of the candidates whom we assess for recruitment purposes. We strive to ensure accountability and transparency with regards to the handling of your personal data at all times.

This notice sets out the basis on which any personal data we collect from you, or that you provide us, will be processed by us.

Please read this document carefully to ensure you understand our views and practices regarding your personal data and how we will treat it.

Definitions

Personal data means any information relating to an identified or identifiable natural person (known as a "data subject"), and can include, for example, names, ID numbers, location data, online identifiers and factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of a data subject. The data protection legislation also recognises '**special categories**' of personal data, the processing of which is subject to stricter regulation than other forms of personal data. This category of personal data includes data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data used to uniquely identify natural persons, data concerning health or data concerning an individual's sex life or sexual orientation.

"Data Protection Law" / "Data Protection Legislation" means EU General Data Protection Regulation 2016/679; together with all other applicable legislation relating to privacy or data protection including but not limited to the Data Protection Act 2018 as may be amended from time to time and the GDPR (General Data Protection Regulation) as it applies in the UK by virtue of section 3 of the European Union (Withdrawal) Act 2018 (known as UK GDPR).

All activities relating to personal data (e.g., collection, structuring, alteration, storage, retrieval, consultation, use, adaptation, disclosure, erasure or destruction], whether using automated means or not, are known as **"processing"** for the purposes of the data protection legislation.

The data protection legislation makes a distinction between those who process data as "controllers" and those who process it as "processors" and imposes different obligations on controllers and processors. **"Controllers"** are individuals or organisations that determine the purposes and means of the processing of personal data. **"Processors"** are individuals or organisations that process personal data on behalf of a controller.

For the purposes of data protection legislation in force from time to time the data controller is:

**Amberjack
Newbury House,
20 Kings Road West
Newbury, Berkshire
RG14 5XR**

Our Data Protection Officer can be contacted at the above address or at dpo@weareamberjack.com.

Who we are and what we do

Amberjack provides consultancy, technology and outsourced recruitment services, specialising in early talent.

The information we collect about the candidates applying to work is limited to that which is deemed absolutely necessary and integral to Amberjack's internal recruitment and assessment processes.

Information you give to us, or we collect about you

This is information about you that you give us by corresponding with us by phone, e-mail or otherwise. It includes information you provide should you, attend our events, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, and report a problem with our site.

The information you give us, or we collect about you may include your:

- Name
- Private/corporate e-mail address
- Phone number/s
- Postcode
- Nationality
- Gender
- Ethnicity
- Sexual Orientation
- Disabilities
- Social economic status
- Academic qualifications

Communication with you regarding opportunities from Future Talent Hub employer partners

If you do not provide certain information when requested, we may not be able to process your application for a vacancy.

Purposes of the processing

Amberjack may use information held about you in the following ways:

To provide you with any information you request from us, or we think will be of interest or relevant to your interest in job opportunities with employer partner of the Future Talent Hub.

We will rely on legal obligation if we are legally required to hold information on you to fulfil our legal obligations.

We will also rely on consent for particular uses of your data. In some cases, express consent may be legally required. Examples of when express consent may be the lawful basis for processing include Special Category [sensitive information]. We will also rely on contract and legal obligation for specific uses of data

The legal basis for the processing

Amberjack's Lawful Basis for the processing of your personal data is to pursue our legitimate business interests, described in more detail below, although we will also rely on the Lawful Basis of legal obligation and the Lawful Basis of consent for specific uses of data.

We will rely on legal obligation if we are legally required to hold information on to you to fulfil our legal obligations.

We will also rely on consent for particular uses of your data. In some circumstances you will be asked for your express consent, if legally required. Examples of when consent may be the lawful basis for processing include Special Category (sensitive information).

Our legitimate business interests

Our legitimate business interests in collecting and retaining your personal data are described below:

To carry out recruitment and assessment activities to fill vacancies, we need to collect, share and store candidate personal data for as long as is reasonably necessary to fully assess against current and planned vacancies.

The reviewing and exchanging of personal data of candidates is a fundamental, essential part of our recruitment process which is designed to ensure that the candidates have the appropriate skill sets and levels of experience required for the vacancy.

Consent

We may rely on consent as a lawful basis for processing. As mentioned above, legally we may be required to get your express consent on certain matters. Should we want or need to rely on consent to lawfully process your data, we shall record your response on our recruitment system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time by completing a Withdrawal of Consent Form, which you can request from our Data Protection Officer.

Disclosure of our information inside and outside of the EEA

We may share your personal information with selected third parties including compliance partners/pre-employment screening providers for the purpose of assessing your suitability for a role.

If we sell all or part of our business, we may be required to provide personal data about you to any prospective purchaser in the course of negotiations. So far as possible such data will be provided in an anonymous form and if this is not possible the prospective purchaser will be required to keep the information confidential. We will transfer your personal data on any transfer or sale falling within the terms of the Transfer of Undertakings (Protection of Employment] Regulations 2006.

The lawful basis for the third party processing will include:

- Their own legitimate business interests in processing your personal data
- For the performance of a contract in place or in contemplation
- To fulfil their legal obligations

Change of purpose

We will only use your personal information for the purpose for which it was collected unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will advise you of this and explain the Lawful Basis for us doing so.

You should be aware that we may process your personal information without your knowledge or consent where this is required or permitted by law.

Inform us of changes

It is important that the personal information we hold about you is accurate and current. Please be sure to keep us informed if your personal information changes during your recruitment process.

How we use sensitive personal information

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations for example in relation to candidates with disabilities and for health and safety purposes.

We may use other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or philosophical belief, this is done for the purposes of meaningful equal opportunities monitoring or reporting. Data used by us for these purposes is anonymised or is collected with your express consent, which can be withdrawn at any time. You are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

Where we store and process our personal data

Amberjack will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice. We are registered with the Information Commissioner's Office and all records retained by the company are done so in accordance with data protection laws.

All information you provide to us, or we obtain is stored on our secure servers, or in locked files. Any personal information is only saved in shared access computer drives ["shared drives", OneDrive] if access is restricted to those with a specific need to know and it is further secured by the setting of permissions or passwords.

Retention of our data

We do the following to try to ensure our data is accurate:

At first contact we check that we have accurate information about you and we keep in touch with you throughout your time registered with the Future Talent Hub. You need to let us know of changes to your personal data.

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate business interests and that you are happy for us to do so. Accordingly, we have a data retention policy and run data routines to remove data that we no longer have a legitimate business interest in maintaining using the following guidelines.

DATA TYPE	STAGE	RETENTION PERIOD
Personal details	Registration with Future Talent Hub	1 year You will receive opt-out notices every 3-months
Personal preferences	Registration with Future Talent Hub	1 year You will receive opt-out notices every 3-months

The criteria we use to determine whether we should retain your personal data includes:

- The nature of the personal data
- Its perceived accuracy
- Our legal obligations
- What stage of the recruitment process you have reached

Your rights

The GDPR provides you with the following rights. To:

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information the company hold about you corrected
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for the company continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where the company is relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction** of processing of your personal information. This enables you to ask the company to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party in certain formats, if practicable.

Access to information

The GDPR gives you the right to access and obtain the personal information held about you. This is known as a "data subject access request".

Your right of access can be exercised in accordance with the GDPR. A data subject access request should be submitted to dpo@weareamberjack.com. No fee will apply under the terms of the GDPR.

Breach Reporting

A personal data breach is a breach that results in the destruction, alteration or unauthorised disclosure or access to personal data.

Amberjack will make every effort to contain any personal data breaches identified and will also undertake an immediate assessment of any potential risks resulting from the breach in line with our data breach incident process. Should it be considered that there is a high risk to an individual/s as a result of the breach then Amberjack will endeavour to inform the individual/s as soon as possible. In such situations where you feel that a breach may have taken place then you must notify our Data Protection Officer immediately.

Changes to our privacy notice

This notice may be updated, revised, replaced and re-issued from time to time, to ensure it continues to meet all legislative requirements and relevant developments in data management and security techniques. Any changes to Amberjack's data processing processes or this privacy notice will be brought to the attention of all employees.

Contact

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to dpo@weareamberjack.com or, write to DPO, Amberjack Global Ltd., Newbury House, 20 Kings Road West, Newbury, Berkshire, RG14 5XR

You also have the right to raise concerns or make a complaint to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted on 03031231113 or at <https://ico.org.uk/concerns/>.