+44 (0)23 9237 4444
headoffice@strgroup.co.uk
strgroup.co.uk

PRIVACY NOTICE

This statement is made on behalf of STR Limited (STR) trading as Blackedge Consulting, Blackfield Associates, Navis Consulting, Insignis Talent, Talos Automation, and STR Group. Any references to "we" "us" or "our" shall be interpreted as references to STR.

STR is committed to protecting and respecting your privacy. Our "Group" means our subsidiaries, our ultimate holding company, and its subsidiaries or associated companies, as defined in section 1159 of the UK Companies Act 2006.

By setting out the basis on which any personal data we collect from you, or that you provide to us, will be processed, we ensure compliance with all relevant, global data protection regulations. This notice should be read in conjunction with our terms of use

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of data protection legislation the Data Controller is STR Limited of 1 Quay Point, Northarbour Road, Portsmouth, PO6 3TD.

Our Data Protection team is contactable at dataprotection@strgroup.co.uk.

WHO WE ARE AND WHAT WE DO

We are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 (our business).

We collect the personal data of the following types of people to allow us to undertake our business:

- Prospective and placed candidates for permanent roles ("Candidates")
- Prospective and live client contacts
- Supplier contacts to support our services
- Employees, consultants
- Prospective and placed contractors, temporary workers For temporary roles ("Workers")

INFORMATION YOU GIVE TO US OR WE COLLECT ABOUT YOU

Sometimes the data we store has been given to us directly by you, other times we have collected it from different sources.

Where we may have collected your data from:

- If you filled in a form on our website
- If you corresponded with us via phone, email or other means of communication
- If you registered to use our services
- If you attended our events or took part in our competitions, promotions or surveys
- If you reported a problem via our website
- LinkedIn and other social media websites
- Job board meetings
- Online CV libraries
- Business cards
- Personal recommendations
- Other employment businesses

If we have collected your information through online CV libraries, business cards or other employment businesses, we will inform you within a maximum of 30 days by sending you this privacy

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notice.

Type of data we may collect:

- Your full name
- Address
- Private corporate email address
- Phone number including mobile device
- Financial information
- Compliance documentation
- References that verify qualifications and experiences
- Right to work in the UK documents
- Curriculum vitae
- Photograph
- Links to professional profiles such as LinkedIn

We work closely with third parties, including but not limited to companies within our Group, business partners, sub-contractors in technical, professional, payment and other services, advertising networks, analytics providers, search information providers, credit reference agencies, IDVT providers, and professional advisors. We may receive information about you from them for the purposes of our recruitment services and ancillary support services.

INFORMATION WE COLLECT ABOUT YOU WHEN YOU VISIT OUR WEBSITE

For each of your visits to our website, we automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet
- your login information if applicable
- browser type and version
- browser plug-in types and versions
- operating system and platform
- information about your visit:
    - including the full Uniform Resource Locators (URL)
    - clickstream to, through and from our website (including date and time)
    - products you viewed or searched for
    - page response times
    - download errors
    - length of visits to certain pages
    - page interaction information (such as scrolling, clicks, and mouse-overs)
    - methods used to browse away from the page, and
    - any phone number used to call our customer service number

PURPOSES OF THE PROCESSING

We use information held about you in the following ways:

- To carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us and to provide you with the information, products and services that you request from us or we think will be of interest to you because it is relevant to your career or to your organisation
- To provide you with information about other goods and services we offer that are similar to those that you have already purchased, been provided with or enquired about
- To provide our core service offering to our Candidates/Workers and clients; the introduction of Candidates/Workers to our clients for the purpose of temporary or permanent engagement. Our service further expands to support individuals throughout their career and to support businesses' resourcing needs and strategies, through the establishing of long term

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relationships
- To provide Candidates/Workers an SMS facility subject to their consent, to facilitate communication with STR. Mobile device information will never be shared with third/parties/affiliates for marketing/promotional purposes.

OUR LEGAL BASIS FOR THE PROCESSING

Our legal basis for the processing of personal data is our 'legitimate business interests' described in more detail below, although we will also rely on contract, legal obligation and consent for specific uses of data.

We will rely on our 'contract' if we are negotiating or have entered into a placement agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.

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

OUR LEGITIMATE BUSINESS INTERESTS

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

As a recruitment business and recruitment agency we introduce Candidates/Workers to clients for permanent employment, temporary worker placements or independent professional contracts. The exchange of personal data of our Candidates/Workers and our client contacts is a fundamental, essential part of this process. In order to support our Candidates'/Worker's career aspirations and our clients' resourcing needs we require a database of Candidate/Worker and client personal data containing historical information as well as current resourcing requirements. To maintain, expand and develop our business we need to record the personal data of prospective Candidates/Workers and client contacts.

CONSENT

If we rely on consent to lawfully process your data, we will request your consent orally, by email or by an online process and record your response on our 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.

OTHER WAYS WE WILL MAKE USE OF YOUR DATA

We may use your information to:
- To operate and mange our website
- To notify you about changes to our service

To ensure that content from our website is presented in the most effective manner for you and for your device
- To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
- To improve our website to ensure that content is presented in the most effective manner for you and for your device
- To allow you to participate in interactive features of our service, when you choose to do so
- To keep our website safe and secure
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you
- To make suggestions and recommendations to you and other users of our website about goods or services that may interest you or them.

We may use automated tools to assist our recruitment consultants in the initial screening of applications, such as identifying specific skills or keywords. However, these tools are used as an aid only. All final decisions regarding your candidacy are made by our human team members.

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COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. For detailed information on the cookies we use and the purposes for which we use them see our Cookie notice.

DISCLOSURE OF YOUR INFORMATION INSIDE AND OUTSIDE OF THE EEA

We will share your personal information with:

- Any member of our group both in the EEA and outside of the EEA
- Selected third parties including:
    - Clients for the purpose of introducing Candidates/Workers to them
    - Candidates/Workers for the purpose of arranging interviews and engagements
    - clients, business partners, suppliers and sub-contractors for the performance and compliance obligations of any contract we enter into with them or you
    - subcontractors including email marketing specialists, advertisers, event organisers, payroll intermediaries, payment and other financial service providers
    - analytics and search engine providers that assist us in the improvement and optimisation of our website
    - credit reference agencies, our insurance broker, compliance partners and other sub-contractors for the purpose of assessing your suitability for a role where this is a condition of us entering into a contract with you

We will disclose your personal information to third parties:

In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.

If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect our rights, property, or safety or those of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

For clarity, neither mobile information nor any text messaging originator opt-in data and consent will be shared with third parties/affiliates for marketing/promotional purposes.

The lawful basis for the third party processing will include:

Their own legitimate business interests in processing your personal data, in most cases to fulfil their internal resourcing needs; satisfaction of their contractual obligations to us as our data processor; for the purpose of a contract in place or in contemplation; to fulfil their legal obligations.

WHERE WE STORE AND PROCESS YOUR PERSONAL DATA

Where we transfer your personal data outside of the UK or the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented. We use specific contracts approved by the UK Information Commissioner's Office (ICO) and the European Commission, such as the International Data Transfer Agreement (IDTA) or Standard Contractual Clauses (SCCs), which provide personal data with a level of protection essentially equivalent to that within the UK and EEA.

Alternatively, we transfer data to countries that the UK and EU have deemed to provide an adequate level of protection.

By submitting your personal data, you agree to this transfer, storing or processing. We will take all

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steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted [using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

RETENTION OF YOUR 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 will run regular automated data routines to remove data that we no longer have a legitimate business interest in maintaining.

We endeavour to keep in touch with you so you can let us know of changes to your personal data

We segregate our data so that we keep different types of data for different time periods. 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;
- whether an interview or placement has been arranged; and
- our recruitment expertise and knowledge of the industry by country, sector and job role.

We may archive part or all of your personal data or retain it on our financial systems only, deleting all or part of it from our main Customer Relationship Manager (CRM) system. We may pseudonymise parts of your data, particularly following a request for suppression or deletion of your data, to ensure that we do not re-enter your personal data on to our database, unless requested to do so.

For your information, Pseudonymised Data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms.

Our current retention policy is available upon request.

YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes and we will collect express consent from you if legally required prior to using your personal data for marketing purposes.

You can exercise your right to accept or prevent such processing by contacting us at dataprotection@strgroup.co.uk.

Our websites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

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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 we 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 us 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 we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes
- Request the restriction of processing of your personal information. This enables you to ask us 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.
- Make a complaint to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: https://ico.org.uk/concerns/

Access to information

The Data Protection Act 2018, EU-GDPR and UK GDPR give you the right to access information held about you. We also encourage you to contact us to ensure your data is accurate and complete. Your right of access can be exercised in accordance with the related legislation. A subject access request should be submitted to dataprotection@strgroup.co.uk.

CHANGES TO OUR PRIVACY NOTICE

Any changes we make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.

CONTACT

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to dataprotection@strgroup.co.uk.

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