



HOW DO WE USE YOUR PERSONAL DATA?

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

1. CANDIDATE DATA

We generally use Candidate data in four ways:

- a. Recruitment Activities;
- b. Marketing Activities;
- c. Equal Opportunities Monitoring; and
- d. To help us establish, exercise or defend legal claims
- e. In appropriate circumstances in the future, we may also use Candidate data for Profiling

Here are some more details about each:

a. 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(s), 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;
- Carrying out our obligations arising from any contracts entered into between us;
- Carrying out our obligations arising from any contracts entered into between Alpha Carnegie 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)



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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.

We may use your personal data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not happy about this, in certain circumstances you have the right to object.

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

b. 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 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;
- Display promotional excerpts from your details on Alpha Carnegie's website(s) as a success story (only where we have obtained your express consent to do so); and
- Provide you with information about certain discounts and offers that you are eligible for by virtue of your relationship with Alpha Carnegie.

We need your consent for some aspects of these activities which are not covered by our legitimate interests (in particular, the collection of data via cookies, and the delivery of direct marketing to you through digital channels) and, depending on the situation, we'll ask for this via an opt-in or soft-opt-in (which we explain further below).

Soft opt-in consent is a specific type of consent which applies where you have previously engaged with us (for example by submitting a job application or CV, or registering for a vacancy to be filled), and we are marketing other recruitment-related services. Under 'soft opt-in' consent we will take your consent as given unless or until you opt out. For most people, this is beneficial as it allows us to suggest other jobs to you alongside the specific



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one you applied for significantly increasing the likelihood of us finding you a new position. For other types of e-marketing we are required to obtain your explicit consent.

If you are not happy about our approach to marketing you have the right to withdraw your consent at any time. Nobody's perfect, even though we try to be. We want to let you know that even if you have opted out from our marketing communications through our preference centre, it is possible that your details may be recaptured through public sources in an unconnected marketing campaign. We will try to make sure this doesn't happen, but if it does, we're sorry. We'd just ask that in those circumstances you opt out again.

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 Alpha Carnegie adverts and other content on other websites, for example Facebook and LinkedIn. If you do not want us to use your data in this way, please turn off the "Advertising Cookies" option (please refer to our Cookies Policy). Even where you have turned off advertising cookies, it is still possible that you may see an Alpha Carnegie advert, but in this case it won't have been targeted at you personally, but rather at an anonymous audience.

c. 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 explicit consent before we can use it. We'll ask for your consent by offering you an opt-in. 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. We will never do this without your explicit consent.



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If you are not happy about this, you have the right to withdraw your consent at any time and you can find out how to do so here.

d. To Help Us 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.

e. Profiling

Although at present all our recruitment activities involve human-decision making during the process, we may in the future use fully automated technologies such as expert systems or machine learning to complete a Candidate selection process from end-to-end, where appropriate and in accordance with any local laws and requirements.

Where appropriate, we will seek your consent to carry out some or all of these activities. If you do not provide consent to profiling, your application will continue to be reviewed manually for opportunities you apply for, but your profile will not be automatically considered for alternative roles. This is likely to decrease the likelihood of us successfully finding you a new job.

You have the right to withdraw that consent at any time.

2. CLIENT DATA

We use Client information for:

- a. Recruitment Activities;
- b. Marketing Activities; and
- c. To Help Us Establish, Exercise Or Defend Legal Claims.

Here are some further details about each:

a. Recruitment Activities

Obviously our main area of work is recruitment through providing you with Candidates. 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.



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- We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests.

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

b. 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 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.

c. To Help Us 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.

3. SUPPLIER DATA

We realise that you're probably busy, and don't want us to be contacting you about all sorts of things. To find the right balance, we will only use your information:

- To store (and update when necessary) your details on our IT systems, 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 may use your personal data for these purposes if we deem this to be necessary for our legitimate interests.

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

4. PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES, 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 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



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- If you were put down by our Candidate as a referee, we will contact you in order to take up a reference. This is an important part of our Candidate quality assurance process, and could be the difference between the individual getting a job or not.
- If you were put down by our Candidate 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.
- We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests.

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

5. 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.