## **Privacy Notice**

Skylarx ("we", "us") is committed to protecting and respecting your privacy. This Privacy Notice (together with any other documents referred to in this document) sets out the basis on which the personal data collected from you, or that you provide to us, will be processed by us in connection with our recruitment processes. Please read the following document carefully, to understand our views and practices regarding your personal data and how we will treat it.

We collect and process some or all of the following types of information from you:

- Information that you provide when you apply for a role. This includes information provided through an online job site, via email, in person at interviews and/or by any other method.
- In particular, we process personal details such as name, email address, address, date of birth qualifications, experience, information relating to your employment history, skills and experience that you provide to us.
- If you contact us, we may keep a record of that correspondence.
- Details of all actions that you carry out through the use of the Services.
- Details of your visits to our website including, but not limited to, traffic data, location data, weblogs and other communication data, the site that referred you to our website and the resources that you access.

**Fair processing principles:** In processing applicants' data the following principles will be adhered to. Personal data will be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that are clearly explained and not used in any way that is incompatible with those purposes;
- Relevant to specific purposes and limited only to those purposes;
- Accurate and kept up to date;
- Kept only as long as necessary for the specified purposes; and
- Kept securely.

**Lawful basis for processing:** We rely on legitimate interest as the lawful basis on which we collect and use your personal data. Our legitimate interests are the recruitment of staff for our business.

**Purposes of processing:** We use information held about you in the following ways:

- To consider your application in respect of a role for which you have applied.
- To consider your application in respect of other roles.
- To communicate with you in respect of the recruitment process.
- To enhance any information that we receive from you with information obtained from third party data providers.
- To find appropriate candidates to fill our job openings.
- To help improve services.

## Consent to data processing

We do not require consent from applicants to process most types of applicant data. In addition, we will not usually need consent to use special categories of personal information in order to carry out legal obligations or exercise specific rights in the field of employment law.

In limited circumstances, applicants may be asked for written consent to process sensitive data. In those circumstances, applicants will be provided with full details of the information that sought and the reason it is needed, so that applicants can carefully consider whether to consent.

Where applicants have provided consent to the collection, processing and transfer of personal information for a specific purpose, they have the right to withdraw consent for that specific processing at any time. Once we have received notification of withdrawal of consent we will no longer process information for the purpose or purposes originally agreed to, unless we have another legitimate basis for doing so in law.

**Security:** We take appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorized way. We limit access to your personal data to those who have a genuine business need to view it. Those

processing your information will do so only in an authorized manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

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 through any online means, therefore any transmission remains at your own risk.

Where we store your personal data in our own systems, it is stored in the US.

The data that we collect from you and process may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who works for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your orders, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing.

In particular, your data may be accessible to staff in the USA or may be stored by our hosting service provider on servers in the USA as well as in the EU. The USA does not have the same data protection laws as the United Kingdom and EEA.

We will only retain applicants' personal information for as long as necessary to fulfil the purposes it was collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We will hold all the data for 24 months.

Your personal information will be deleted on one of the following occurrences:

- Deletion of your personal information by you or
- Receipt of a written request by you to us.

**Your rights:** Under the <u>General Data Protection Regulation</u> you have a number of important rights. In summary, those include rights to:

- access to your personal data and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- request the erasure of personal data concerning you in certain situations
- request access to the personal data concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal data concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you, see "automated decision making/profiling" section of this Privacy Notice for more information
- object in certain other situations to our continued processing of your personal data
- otherwise restrict our processing of your personal data in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the <u>Guidance from the UK Information Commissioner's</u> <u>Office (ICO) on individuals rights under the General Data Protection Regulation</u>.

If you would like to exercise any of those rights, please:

- contact us using our Contact details below,
- let us have enough information to identify you,
- let us have proof of your identity and address, and
- let us know the information to which your request relates.

**How to complain:** We hope that we can resolve any query or concern you raise about our use of your information.

The <u>General Data Protection Regulation</u> also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European

Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred.

**Contact:** All questions, comments and requests regarding this Privacy Notice should be addressed to <u>hello (at) skylarkstrategies (dot) com</u>