

Who we are and how do we process your personal data?

Lainsburgh BV ("Lainsburgh") is a specialist recruiter operating across Europe. We are committed to protecting the privacy of our candidates, clients and users of our website. Lainsburgh will be acting as Data Controller of your data.

We want to provide a safe and secure user experience. We will ensure that the information you submit to us, or which we collect, via various channels (including our website, through written correspondence (including e-mail), conversations or meetings with our consultants, or through any of our offices or websites globally), is only used for the purposes set out in this Privacy Policy.

Through this Privacy Policy we aim to inform you about the types of personal data we collect, the purposes for which we use the data and the ways in which the data is handled. We also aim to satisfy the obligation of transparency under the EU General Data Protection Regulation 2016/679 ("GDPR") and national laws that may be applicable.

Scope

Protecting your personal data is our priority. This privacy policy explains how the Companies process and protect personal data about:

- candidates who register with us for roles that we are managing for other employers and for roles within the Companies, or through our website, job boards, social media sites or other sources;
- prospective candidates;
- prospective clients;
- business contacts at our clients and suppliers; and
- users of our websites (collectively "you" or "your").

It also tells you about your privacy rights including your right to object to our processing. If you would like to contact us, please see the "How to Contact Us" section of this policy.

Personal data we collect

Candidates

When you register with us as a candidate to provide work finding services to you, we process your personal data, including but not limited to your name, contact details and information from your CV. Where permitted by law, we may also collect information relating to your health (for example, disability information for reasonable work adjustment purposes), diversity information, including race, ethnic origin, sexual orientation and religion (for equal opportunity monitoring purposes) as well as details of any unspent criminal convictions where required by a client or by us, if you apply for a role with us.

The Lainsburgh entity acting as Data Controller of your data in this case will be the one managing the process to which you have applied.

If you use our website, click on links in emails we send to you, open or forward them, or sign up to receive job alerts or other contents from us, we also collect personal data from those interactions.

We also obtain personal data about you from third parties, including,

- referees - when you are offered a job;
- former employers - to confirm dates of employment;
- educational institutions - to check your academic qualifications;
- credit reference agencies - if we need to check your financial standing;
- publicly available sources such as LinkedIn and social media sites to enhance the information we hold about you, in order to help us find more suitable roles for you;
- clients to whom we have provided your CV and who have engaged with you as part of a job application or who have given feedback on your CV.

Prospective Candidates

We collect personal data about you including your name and contact details and professional biographical details obtained from publicly available sources such as

LinkedIn, CV websites and social media websites, so that we can contact you if we think you may be interested in our work finding services at a future date. We may also obtain your personal data through another candidate or an employer who recommends you as a contact. Lainsburgh will act as Data Controller of your data in this case will be the entity to which the consultant who has identified you as a prospective candidate belongs.

Prospective Clients

We collect your contact details and data relating to your function or position to establish commercial relationships with your company. Lainsburgh will act as Data Controller of your data in this case will be the entity to which the consultant who has identified you as a potential client belongs.

Users of our website or apps

We collect personal data such as your IP address and other data about your device which we need to provide our online content to you. We also collect data about your engagement with our website or apps such as the pages you view.

If you contact us, we will also collect information about your enquiry. We use cookies and similar technologies to collect a lot of this information and our cookie policy tells you more about this. Lainsburgh acting as Data Controller in this case shall be the entity to which the website belongs, whose details can be found in the website's legal notice or the list attached at the beginning of this Privacy Policy.

Clients

We collect personal data such as your name, job title and contact details. We also process personal data about what communications we have had with you, including whether you have opened or forwarded any emails, newsletters or other content we have sent to you. We also process feedback that you provide about our candidates. Lainsburgh will act as Data Controller in this case will be the entity that is the counterparty in the contract we sign with you or with the company you represent.

If you provide information to us about a candidate (for example, if you confirm a candidate has worked with you or if you provide a reference), then we will obtain your details from the candidate and we will keep a record of the personal data that you provide to us about that candidate.

We process personal data about you from public domain sources such as LinkedIn and social networking sites, or because you were a delegate at one of our events or at an event where the event organiser is permitted to share delegate details with us.

Suppliers

We typically collect your name and contact details as a business contact for your organisation. Lainsburgh will act as Data Controller in this case will be the entity that is the counterparty in the contract we sign with you or with the company you represent.

Providing your personal data

In some cases, it will be necessary for you to provide personal data to us. If you don't provide us with the personal data we ask for, we may not be able to provide you with our services.

How we use your personal data

Candidates

We use your personal data to:

- provide you with work finding services;

- communicate with you;
- enable you to upload your CV and apply for jobs;
- personalise your experience by creating a candidate profile;
- enable us to monitor equality and diversity;
- provide you with interviewing and salary advice and
- send you direct marketing for the purposes of informing you about job opportunities, industry reports and insights, events, promotions and competitions, and other content in accordance with your marketing choices.
- We also run targeted and relevant banner advertising on our website and within your social networks to present you and people like you with jobs and content that we believe will be of interest. We target these ads based on your previous interactions with our website, emails and through your engagements with our consultants. Your interaction with our ads may be used to measure the effectiveness of our ad campaigns and to improve our marketing strategy. This processing is carried out via Cookies and only if you have previously provided consent.

Prospective Candidates and Clients

We use your personal data to:

- determine if you may be interested in our services and how we can assist you;
- to contact you and find out if you are interested in our services.

Users of our website or apps

We may use your personal data to:

- improve and personalise your experience when you use our website or apps; and
- personalise advertising you receive from us.

Clients

We may use your personal data:

- to provide recruitment services to you;
- to communicate with you;
- to get feedback from you on our services through client satisfaction surveys, in order to improve our services and to develop new services;
- to maintain our business relationship with you;
- to answer your enquiries when you contact us;
- to fulfil contractual obligations to you;
- to establish, exercise or defend legal claims; and

- for direct marketing purposes.

Suppliers

We use your personal data:

- to communicate with you;
- to maintain our business relationship with you;
- to answer your enquiries when you contact us;
- to fulfil contractual obligations to you;
- to establish, exercise or defend legal claims; and for direct marketing purposes.

You can unsubscribe from receiving marketing communications from us by using the unsubscribe methods contained in communications we send to you or by contacting us. We have also established a marketing preference centre where you can view and make decisions about your marketing preferences and opt out of receiving marketing from us at any time.

Legal Grounds for processing your Personal Data

Under the GDPR, we rely on the following legal grounds to process your personal data:

(a) **Performing a contract** - in order to perform our obligations under a contract with you, for example where clients contract for services and candidates accepting our terms and conditions. Or in respect of prospective clients or candidates to take steps that would be necessary in order to enter into a contract with us.

(b) **Compliance with a legal obligation** - where we need to process your personal data to comply with legal or regulatory obligations.

(c) **Our legitimate interests or those of a third party** - including:

- responding to your requests and enquiries (the legitimate interest of the Companies in this case is to maintain a constant and updated communication with clients and candidates, which is part of any commercial relationship);
- optimising the performance of our website and user experience;
- contacting prospect clients in order to establish commercial relationships with clients (the legitimate interest of Lainsburg is to maintain relations of any kind with the company where the contact person works).
- informing you about our services, job opportunities, industry reports and insights, events, promotions and competitions (the legitimate interest

of Lainsburgh is to inform clients and candidates about similar services and products) and;

- providing satisfaction surveys of our services.

We have performed a legitimate interest assessment in order to confirm that our interests are not overridden by your interests or fundamental rights and freedoms, you can ask for this assessment using the contact details below.

(d) **Consent** In some circumstances, we will ask for your consent to process your personal data. For example, if you register for a job, we will offer you the possibility of registering for similar job alerts. To the extent that we are processing your personal data based on your consent, you have the right to withdraw your consent at any time. Please contact us, if you would like to withdraw your consent.

Who we share your personal data with

We will share your personal data with:

Third Parties

If you are a candidate, we share your personal data with clients who have vacancies for jobs which you are interested in. The applicable lawful basis here would be the same as described above: the performance of the contract with clients and candidates, or to take steps necessary to enter into a contract, and the legitimate interests of Lainsburgh in providing candidates' information and services to clients.

We also share your personal data and, where necessary and permitted by the law, special category data with third party service providers who perform services and functions on our behalf, such as:

- conducting employment reference checks;
- conducting qualification checks;
- carrying out criminal convictions checks (as required);
- verifying details you have provided from third party sources;
- conducting psychometric evaluations or skills tests;
- hosting personal data for us;
- providing professional advice to us;
- providing data analytics to us;
- carrying out testing and development work on our business technology systems;
- administering surveys or competitions on our behalf;
- assisting us to communicate with you; and
- providing research and mailing house or other direct marketing services.

We contractually require minimum standards of confidentiality and data protection from our third party service providers. If we need to send personal data outside the EEA, we will ensure that adequate safeguards are in place, such as the Model Clauses.

Other Disclosures

In addition, we may disclose your personal data:

- if we are legally required to do so;
- to law enforcement agencies, regulators or other government officials; and
- to the new business owners and their advisers in the event of a re-organisation, merger, sale, joint venture, assignment, or other transfer or disposition of all or any part of our business.

Keeping your personal data secure

We have implemented and maintain appropriate technical and organisational measures to protect your personal data from accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. Only authorised personnel and third party service providers are provided with access to personal data on a need to know basis, and these employees and service providers are contractually obliged to treat this information as confidential.

How long we hold your personal data for

We will keep your personal data for as long as we need to in order to fulfil the purpose we collected it for, which may be an ongoing purpose. For example, if you're a candidate, we will retain your personal data for the duration of our business relationship with you and beyond, as we often support candidates with job placements over many years and potentially throughout their careers.

We keep some personal data for longer than others. To determine the appropriate retention period for personal data, we consider factors such as the purposes for which we process your personal data, including any legal, regulatory, accounting and reporting obligations, the nature and amount of personal data that we hold about you, and the potential risk of harm to you from unauthorised use or disclosure of your personal data.

Where we process your personal data for direct marketing purposes, we will do so until you ask us to stop, and for a short period after this (to allow us to implement your request). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely, so that we can respect your request.

Your rights in relation to personal data we hold about you

You have several rights under EU data protection laws. These rights include the right to ask us for a copy of your personal data, to correct, delete or restrict processing of your personal data; to obtain the personal data you provide to us for a contract or with your consent in a structured, machine-readable format, and to ask us to share (port) this data to another controller.

In addition, you can object to the processing of your personal data in some circumstances (in particular, where we don't have to process your personal data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

These rights may be limited, for example, if complying with your request would reveal personal data about another person, where they would infringe the rights of a third party (including our rights) or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests for keeping. We will inform you of any relevant exemptions we are relying on when we respond to your request.

How to Contact Us

Exercising your rights

To exercise your rights, or to withdraw your consent to processing, or to unsubscribe from receiving marketing communications from us, you can email us at info@lainsburgh.com

Questions and Complaints

If you have any questions about our privacy policy, about our processing of your personal data, or wish to make a complaint, you can email us at info@lainsburgh.com

If you have unresolved concerns, or believe that a personal data breach happened, you have the right to complain to your competent supervisory authority.

Changes to our Privacy Policy

We may change this privacy policy at any time and will be update on our website. This Privacy Policy version is in force since July 2021.