

#### Vitae's Commitment

Vitae Financial Recruitment Limited (Vitae) are committed to protecting and respecting our candidates' and clients' data and take care to comply with the data related rights of all individuals.

This notice together with our terms of business sets out the basis on which any personal data Vitae collect from you or that you provide, will be processed. You are considered to be accepting the following terms and conditions every time you (as 'the candidate') apply for one of Vitae's vacancies, or (as 'the client') communicate with Vitae regarding your hiring needs, or indeed visit www.vitaefinancialrecruitment.com

#### 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 or temporary roles.
- Prospective and live client contacts.
- Supplier contacts to support our services.
- Employees, consultants,

We collect information about you to carry out our core business and ancillary activities.

# Information you give to us, or we collect about you.

This is information about you that you give us by filling in forms on our site www.vitaefinancialrecruitment.com (our site) or by corresponding with us by phone, e-mail, LinkedIn or otherwise. It includes information you provide when you register to use our site, to enter our database, subscribe to our services, attend our events, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, and when you report a problem with our site.

The information you give us, or we collect about you may include your name, address, private and corporate e-mail address and phone number, financial information, compliance documentation and references verifying your qualifications and experience and your right to work in the United Kingdom, curriculum vitae and photograph, links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, Instagram, Facebook or corporate website.



### Information we collect about you when you visit our website.

Regarding each of your visits to our site, we will 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

Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (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 office or mobile.

#### Information we obtain from other sources.

This is information we obtain about you from other sources such as LinkedIn, corporate websites, job board websites, online CV libraries, and personal recommendations.

## Purposes of the processing and the legal basis for 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.

The core service we offer to our candidates and clients is the introduction of candidates to our clients for the purpose of temporary or permanent engagement. However, our service expands to supporting individuals throughout their career and to supporting businesses' resourcing needs and strategies.

Our legal basis for the processing of personal data is our legitimate interests, described in more detail below, although we will also rely on contractual obligations to which you are subject, legal obligations and consent for specific uses of data.

We will rely on contractual obligations 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 in some cases, where we are required by law or regulation to process your data.



We will in some circumstances rely on consent for uses of your data. Where we rely on consent, you will be asked for your express consent. An example of when we will rely on consent as the legal basis for processing your data is when we process your data for marketing purposes.

### **Our Legitimate Interests**

Vitae's Legitimate interests in collecting and retaining your personal data is described below: As a recruitment business and recruitment agency we introduce candidates to clients for permanent employment, temporary worker placements or independent professional contracts. The exchange of personal data of our candidates and our client contact details is a fundamental part of this process. To support our candidates' career aspirations and our clients' resourcing needs, we require a

database of candidate and client personal data. The database will contain 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 and client contacts.

#### Consent

Should we want or need to rely on consent to lawfully process your data we will request your consent orally, by email or by an online process for the specific activity we require consent for 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 processing at any time.

Vitae does not undertake automated decision making or profiling. We use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision-making process.

### Other uses we will make of your data:

We will also use your data:

- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To improve our site to ensure that content is presented in the most effective manner for you when you are using your computer or other devices.
- To notify you about changes to our service.
- To allow you to participate in interactive features of our service, when you choose to do so.
- As part of our efforts to keep our site 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 site about goods or services that may interest you or them.



## Do you have to provide us with personal data?

You may refuse to give us your personal and sensitive personal data. Furthermore, you have the right to ask us to delete, change or stop processing your data that we have already received or collected. If you do not provide us with personal or sensitive personal data, or if you request a restriction of processing however, we may not be able to provide you with the services that you have requested and that are stated in this policy.

#### **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 allows us to improve our site.

### Disclosure of your information inside and outside of the UK and the EEA

We will share your personal information with:

Any member of our business in the UK, the EEA and outside of the EEA.

Selected third parties including:

- Clients for the purpose of introducing candidates to them.
- Candidates 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, event organisers, payment and other financial service providers
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users. We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- 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:

- If 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 Vitae is acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data to comply with any legal obligation, or in order to enforce or apply our terms of use, or to protect the rights, property, or safety of Vitae, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

The lawful basis for the third-party processing will include:

- Their own legitimate 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.

#### 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 interests and that you are happy for us to do so.

We do the following to try to ensure that the data we hold on you is accurate:

- Our website enables you to manage your data and to review whether the details we hold about you are accurate.
- Prior to making an introduction we check that we have accurate information about you
- We 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 include:

- 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.

#### Your rights

Our site may, from time to time, contain links to and from the websites of our partner networks 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.

The GDPR provides you with the right 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: <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>.

## **Changes to Vitae's Privacy Notice**

Any changes we make to our privacy notice in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy notice. This Privacy Policy was last updated on 17<sup>th</sup> September 2024.

## **Legal Disclaimer**

Vitae Financial Recruitment Limited (Vitae) has taken, and will continue to take care in the development, preparation and maintenance of the content for the Vitae website. Vitae will use its reasonable endeavours to ensure only accurate information is posted on its website. However, Vitae shall not be under any duty, nor does it guarantee or warrant the accuracy or reliability of any information, content or materials in this site and/or that such content is up to date. Vitae shall not be liable for any losses as a result of reliance on information provided. The content of this web site



may be changed at any time without notice. Vitae expressly excludes any and all liability for errors or omissions with respect to the content and the website, save to the extent that such liability arises from Vitae's fraud or fraudulent misrepresentation or from any death or personal injury that arises due to our negligence. Vitae accepts no responsibility for any loss or damage whatsoever resulting from reliance on any statements contained in this website. The information provided on this website is provided without any warranty of any kind, either express or implied. While Vitae uses reasonable efforts to obtain information from sources which it believes to be reliable, it makes no representation that the information or opinions contained on the website, or associated links to the website, are accurate, reliable or complete. Vitae does not warrant that the functions contained in the site will be uninterrupted or error-free, that defects will be corrected, that the site or any server that makes it available is free from viruses or other harmful components, or that successful or accurate results or outcomes will result from your use of this site. Access to the website is permitted on a temporary basis, and Vitae reserve the right to withdraw or amend the content provided on the website without Notice. Vitae are not under any duty to make the website available and will not be liable if for any reason the website is unavailable, totally or partially, at any time or for any period.

Vitae does not guarantee that any client will offer any candidate an interview or respond to the candidate's submission of their information. The website does not constitute or purport to constitute a source of advice or a means to establish a business relationship of any kind between you and Vitae.

#### Contact

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to <a href="mailto:enquiries@vitaefr.com">enquiries@vitaefr.com</a>

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