

PRIVACY POLICY

We take data protection very seriously and understand the importance of protecting your privacy and Personal Information. "Personal Information" is information that identifies you as an individual such as your name, date of birth, email address, IP address and CV.

How do we collect information from you?

We collect and use your Personal Information in accordance with this our Privacy Policy.

The majority of the Personal Information you provide to us freely when you give us your CV or job cover letter to a job application.

Please do not submit such Personal Information to us if you do not wish us to collect it.

However, please be aware, some Personal Information may include information you voluntarily, but unintentionally provided to us (for example, if you express preferences regarding searches for jobs related to trade unions).

We also collect from:

- our websites (the "Websites");
- the software applications made available by us for use on or through computers and mobile devices (the "Apps");
- cookies ("Cookies");
- publicly available information; and
- other tools and applications (our "Online Content").

What Personal Information do we collect?

Personal Information we collect about you may include the following:

- General identification and contact information: your name; address; email; IP address; telephone details; gender; marital status; family status; date and place of birth; physical attributes including photos
- Other sensitive information: trade union membership, religious beliefs, political opinions or racial or ethnic origin, and criminal record.
- Information enabling us to provide products and services: age, location, whether or not you hold a driving licence that enable identification of job search (for example, post code or job role)
- Marketing preferences: enter a contest or prize draw or other sales promotion, or respond to a voluntary customer satisfaction survey
- Statistical information: aggregate statistical information about site visitors and users for internal use and for other lawful purposes eg. Salary averages. We provide this information to candidates, advertisers, suppliers and other reputable third parties. Where we provide such information we will provide this in an anonymous format and not include any Personal Information.
- Information from Apps: submit comments to the Site, participate in message boards, blogs, send us emails or any other user generated content facility • Publicly available information in relation to professional history: educational background; employment history; skills and experience; professional licenses and affiliations; educational and professional qualifications

What legal basis do we rely on to process your Personal Information?

On some occasions, we process your data with your consent. For example, we rely on consent when we send promotional material or if you link your account to your Social Network account. You have the right to withdraw consent at any time. Where consent is the only legal basis for processing, we will cease to process data after consent is withdrawn. The processing is necessary to fulfil a contract Drew Chapman may process your data when we need to do this to fulfil a contract with you, such as to send your CV to an employer or recruiter for a specific job application.

Legitimate Interest

Drew Chapman also processes your data when it is in our legitimate interests to do this and when these interests are not overridden by your data protection rights.

Our legitimate interests include:

- ensuring the security and integrity of our Services and in ensuring that our Website and Apps operate effectively;
- selling and supplying goods and services to our candidates;
- protecting candidates, employees and other individuals and maintaining their safety, health and welfare;
- promoting, marketing and advertising our products and services;
- sending promotional communications which are relevant and tailored to individual candidates;
- understanding our candidates' behaviour, activities, preferences, and needs;
- improving existing products and services and developing new products and services;
- handling customer contacts, queries, complaints or disputes; and
- fulfilling our duties to our candidates, colleagues, shareholders and other stakeholders.

The processing is necessary because of a legal obligation that applies

Drew Chapman may process your data to comply with our legal and regulatory obligations e.g. preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies

Who do we share your Personal Information with?

We may share your personal data with associated companies which also operate online job portals. Where they have access to your personal data they will use it only for the purposes set out in this Privacy Policy. Drew Chapman will remain responsible for the management and security of jointly used Personal Information. Access to Personal Information within Drew Chapman is restricted to those individuals who have a need to access the information for our business purposes.

Recruiters and other agents

In the course of our business to help you search for and get a job, Drew Chapman may make Personal Information available to third parties such as recruiters and other intermediaries and agents and other business partners.



Our service providers include

External third-party service providers, such as accountants, auditors, experts, lawyers and other outside professional advisors; IT systems, support and hosting service providers; printing, advertising, marketing and market research and analysis service providers; document and records management providers; technical engineers; data storage and cloud providers and similar third-party vendors and outsourced service providers that assist us in carrying out business activities.

- Governmental authorities and third parties involved in court action
- Drew Chapman may share Personal Information with governmental or other public authorities (including, but not limited to, workers' compensation boards, courts, law enforcement, tax authorities and criminal investigations agencies); and third-party civil legal process participants and their accountants, auditors, lawyers and other advisors and representatives as we believe to be necessary or appropriate: (a) to comply with applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our group companies; (f) to protect our rights, privacy, safety or property, and that of our group companies, you or others; and (g) to allow us to pursue available remedies or limit our damages.

Other third parties

Occasionally, we may share Personal Information with other third parties. We will always do this under contract and in accordance with your instructions.

How we use Personal Information?

We use Personal Information to do some or all of the following:

- Communicate with you as part of our business;
- Send you important information regarding changes to our policies, other terms and conditions, the Drew Chapman Website, App and other administrative information;
- Provide improved quality, training and security and manage other commercial risks;
- Carry out market research and analysis, including satisfaction surveys;
- Provide marketing information to you (including information about other products and services offered by selected third-party partners) in accordance with preferences you have expressed.
- Personalise your experience on the Drew Chapman Website by presenting information and advertisements tailored to you;
- Allow you to participate in contests, prize draws and similar promotions, and to administer these activities. Some of these activities have additional terms and conditions, which could contain additional information about how we use and disclose your Personal Information, so we suggest that you read these carefully;
- Facilitate social media sharing functionality;
- Manage our infrastructure and business operations, and comply with internal policies and procedures, including those relating to auditing; finance and accounting; billing and collections; IT systems; data and website hosting; business continuity; and records, document and print management;

- Resolve complaints, and handle requests for data access or correction;
- Comply with applicable laws and regulatory obligations (including laws outside your country of residence), such as those relating to anti-money laundering and anti-terrorism; comply with legal process; and respond to requests from public and governmental authorities (including those outside your country of residence);
- Establish and defend legal rights; protect our operations or those of any of our group companies or insurance business partners, our rights, privacy, safety or property, and/or that of our group companies, you or others; and pursue available remedies or limit our damages.
- International Transfers of Personal Information
- Personal Information which you supply to us is generally stored and kept inside the European Economic Area.

However, due to the nature of our global business and the technologies required, your Personal Information may be transferred to third party service providers outside the EEA, in countries where there may be a lower legal level of data protection. In such situations, we transfer the minimum amount of data necessary, anonymise it where possible and enter legal contracts to aim to ensure these third parties handle your Personal Information in accordance with this Privacy Policy and the European levels of data protection.

How can you manage or delete Personal Information?

When you access our website online, we store some information about you. This is anonymous and used for statistical purposes.

Your CV can be viewed by Drew Chapman and our clients, if you have consented to this.

Please note that Drew Chapman reserves the right to remove from our database, CVs which include any content that we consider to be illegal or offensive.

However, if you would like to permanently delete your information from our systems/records, you can send an email to our Data Protection Officer (DPO) (see below) with the subject line "Permanently delete my information and account". Please do not forget to tell us who you are.

Security

Drew Chapman is committed to keeping your personal data safe and secure from unauthorised access to or unauthorised alterations, disclosure or destruction of information that we hold.

Our security measures include: -

- encryption of our services and data;
- review our information collection, storage and processing practices, including physical security measures;
- restrict access to personal access to personal information to Drew Chapman employees, contractors and agents who need to know that information in order to process it for us and who are subject to contractual confidentiality and processing obligations. They may be disciplined or their contract terminated if they fail to meet these obligations; and
- internal policies setting out our data security approach and training for employees.
- Additional Services for Website.

Marketing and Advertising

Online Behavioural Advertising

We partner with third-party advertising networks so that we and other advertisers can display advertising which is more relevant to you and your interests on our Web site or on other sites that you visit and assess the performance of that advertising. We and our ad network partners may utilise cookies or web beacons along with other codes such as your Identifier for Advertising (IFA) or Android ID for your phone to better understand your interests from the web pages you interact with and the search terms you use on our site to build a picture of the category of interests or preferences you have and to provide advertisements about goods and services that may be of interest to you. Our ad network partners do not collect and do not have access to any information from which you can be directly identified such as your real name or address or email. They may, however, anonymously track your Internet usage across other websites in their networks beyond these Sites. To learn more about the use of this information or to choose not to receive tailored advertising by opting out, you can visit either the Network Advertising Initiative at networkadvertising.org or the European Interactive Digital Advertising Alliance (EDAA) at <http://www.youronlinechoices.com> or visit the privacy statements of our partners: Google, Adobe and Tealium. You can also learn more about our use of cookies and similar technologies and your choices by reading our cookies policy. Please note that if you opt-out you will continue to receive generic advertising that has not been targeted to you and your interests.

Your Rights

You have the following rights:

- the right to ask what personal data that we hold about you at any time, subject to a fee specified by law (currently £10);
- the right to ask us to update and correct any out-of-date or incorrect personal data that we hold about you free of charge; and
- (as set out above) the right to opt out of any marketing communications that we may send you.
- If you wish to exercise any of the above rights, please contact us using the contact details set out below.

Children and minors

Drew Chapman is not directed towards individuals under the age of eighteen (18), however we are aware due to the nature of some of the job offerings, those between 14 and 18 may use the Services.

Individuals under the age of thirteen (13) are expressly prohibited from using Drew Chapman Website and App, unless parental consent is provided and we are notified.

Third Party Privacy Practices

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties to which display on the Drew Chapman website. The inclusion of a link on the Website does not imply endorsement of the linked site or service by us. Please note that we are not responsible for the collection, usage and disclosure policies and practices (including the data security practices) of other organisations or any other software application developer or



provider, social media platform, operating system or wireless service provider, or device manufacturer, including any Personal Information you disclose to other organisations through or in connection with the Apps or our Social Media Pages.

Please note that although we require candidates who use our services, such as employers seeking to recruit staff, to agree to use the information made available solely for recruitment-related purposes, we do not control their use of any information that they have access to as part of receiving our services. Please be aware your current employer may be a customer of Drew Chapman. Although it is a requirement of our Contract and Terms and Conditions of Drew Chapman not to use Personal Information for any purpose other than to obtain a job, we cannot restrict the candidates who access profiles on our database and cannot be held responsible for any eventuality. As part of the registration process Drew Chapman offers you the option of remaining anonymous.

Who to contact about your Personal Information

If you have any questions about this policy or our use of your Personal Information you can email info@drewchapman.co.uk or write to the Data Protection Officer, Drew Chapman Search and Selection, Coppergate House, 16 Brune Street, London, E1 7NJ.

If you do not think we are handling your Personal Information adequately, you have the right to lodge a complaint with the Information Commissioner's Office. Further information, including contact details, are available at <https://ico.org.uk>.

Changes to Privacy Policy

We review this Privacy Policy regularly and reserve the right to make changes at any time to take account of changes in our business and legal requirements. We will place updates on our website.