



LEXICAL

PRIVACY POLICY

Lexical takes your privacy seriously. We are a 'controller' of the personal information that you provide to us and this privacy notice sets out how, why and for how long we will use your personal data, as well as who it is shared with. It also explains your legal rights as a data subject and how to exercise them.

WHAT WE NEED FROM YOU

When you register with us or agree to work with us on securing a new position or recruiting for one we process information.

CANDIDATES

We collect the information necessary to be able to find available opportunities and further information needed so we can assess your eligibility for roles. This information includes: your name private and corporate email address, postal address and telephone number; financial information; curriculum vitae; work history; your educational records and training, work performance and right to work; compliance and identity documentation; references and links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website.

Depending on the nature of a role considered for you and also depending upon the applicable jurisdiction, we may need to collect and process sensitive personal data about you which may include information about your health (including details of any sick leave taken during your previous roles), details of any disability, details of any offences you have committed or are alleged to have committed and whether you are a member of any professional or trade associations.

The following are the different sources we may collect personal data about you from:

- Directly from you, by corresponding with us in person, by phone, e-mail or otherwise.
- Through publicly available sources with professional relevance.
- Professional social media and networking sites (including LinkedIn)
- Corporate websites
- By Reference or word of mouth. For example, you may be recommended by a friend, a former employer, a former colleague or even a present employer or we may get a reference from your previous employer or a named referee included on your application form or curriculum vitae.

CLIENTS

We collect the information necessary to be able to work with you as recruitment consultants and introduce candidates to you. This information includes Business details, Points of contact, Job Specifications, Information about the firm/ business – sometimes confidential such as your recruitment processes and salary details and such.

WHY WE NEED YOUR PERSONAL INFORMATION

We need details so we can manage our working relationship with you professionally and represent you accurately. In order to support our candidates' career aspirations and our clients' resourcing needs we require a database of candidate and client personal data containing 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. Our processing is necessary for our legitimate interests.

We will rely on contract 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 if we are legally required to hold information on you to fulfil our legal and regulatory obligations, such as disclosure to public authorities, regulators and investigations.

If you are interviewed and submitted as a candidate, then this may involve the processing of more detailed personal data including sensitive data such as health information that you or others provide about you.

We use your personal data so that we can provide our services to you, including:

- carrying out our obligations arising from any contracts we intend to enter into or have entered into between you and us;
- providing you with information about job vacancies and to assist you in finding a suitable position by matching your skills, experience and education with a potential employer. We may initially collect basic information on you such as contact details, job role and experience and then pass this on to the client in search of talent. If you are chosen by the client and go through to the next stage we will then be collecting more information from you at the interview (or equivalent) stage and onwards in that manner;
- if you work for a client or a potential client looking to fill roles, to contact you about candidates and sharing your contact details with a candidate, at interview stage and beyond;
- maintaining our business relationship

WHY WE NEED YOUR PERSONAL INFORMATION - LEGITIMATE PURPOSES

We need your information in order to work with you to secure the best position or source the best candidates. We will expressly ask for permission to release your details to any third party whom we are looking to work with on your behalf.

WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We will share your information with permission, in pursuit of securing you the best position/candidate. We may be required to share personal information with statutory or regulatory authorities to comply with statutory/legal obligations. We may also share personal information with professional and legal advisors for the purpose of obtaining advice.

HOW WE PROTECT YOUR PERSONAL INFORMATION

Your personal information is accessed only for the purposes set out above. It is stored in an electronic format with our IT/database provider, Trisys Business Software as data processor (database and file storage). All data including emails and outlook is accessed via a secure Cloud system, access is password protected and there are firewalls in place to protect against external breaches. Any confidential paperwork records are held in a secure locked filing cabinet. Your personal data, where relevant, is transferred electronically into our system and our database which is password protected.

HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We only retain your information for as long as is necessary for us to use your information as described above or to comply with our legal obligations. However, please be advised that we may retain some of your information after you cease to use our services, for instance if this is necessary to meet our legal obligations, such as retaining the information for tax and accounting purposes.

- When determining the relevant retention periods, we will take into account factors including:
- our contractual obligations and rights in relation to the information involved;
- legal obligation(s) under applicable law to retain data for a certain period of time;
- our legitimate interest where we have carried out a balancing test to ensure that our processing is necessary and that your fundamental rights of privacy are not outweighed by our legitimate interests, before we go ahead with such processing.
- statute of limitations under applicable law(s);
- (potential) disputes;
- if you have made a request to have your information deleted; and
- guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information once this is no longer needed.

YOU HAVE A RIGHT TO:

- Change your communication preferences with us at any time or restrict the processing of your personal data for specific purposes
- Request that we correct your personal data if you believe it is inaccurate or incomplete
- Request that we delete your personal information
- Access the personal information that we hold about you through a 'subject access request'.

You can contact us: Sarah Baxter, Director, Lexical, 21 Lansdowne Crescent, Edinburgh. EH12 5EH. Tel: 0131 535 1075 Email: Edinburgh@lexical.co.uk or sarah@lexical.co.uk

If you are dissatisfied, you have a right to raise a complaint with the Information Commissioner's Office at www.ico.org.uk with whom we are registered.

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