



PRIVACY POLICY

Introduction

Welcome to Green Future Search Limited privacy policy. This policy was created on 24 July 2023 and updated on 6 April 2024.

Green Future Search Limited is a staffing solutions partner to global organisations, any processing of personal data is conducted for the purpose of promoting, providing, evaluating and reporting on such services. Green Future Search Limited respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

For the purpose of data protection law and processing activities, Green Future Search Limited is registered with the Information Commissioners Office (ICO) in the UK.

Green Future Search Limited complies with data protection laws globally, with the minimum standard applied being that found within the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679). The Regulation enhances privacy rights for individuals and provides a strict framework within which commercial organisations can legally operate.

GDPR applies to processing of Personal Data carried out by organisations operating within the European Union (EU) and those organisations outside the EU that offer services to individuals within the EU. For this reason and to satisfy global data protection laws, GDPR obligations are applied to Green Future Search Limited's operations.

Definitions

For the purpose of this privacy policy the following definitions shall apply:

- Candidates – Means individuals who have registered or engaged with us or our advertising partners regarding potential fixed term and permanent opportunities.



- Clients – Means individuals that represent an organisation who has or is seeking to use the services offered by Green Future Search Limited and those who Green Future Search Limited engages with for potential staffing solutions.
- External Providers – Means suppliers, vendors, service providers, business partners and other third-party organisations who provide products or services to Green Future Search Limited, including regulatory bodies or similar and refers to the individuals representing these organisations.

1. Important information and who we are:

Purpose of this privacy policy

This privacy policy aims to give you information on how Green Future Search Limited collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter **OR** contact us through our website **OR** purchase a service.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

Green Future Search Limited is the controller and responsible for your personal data (collectively referred to as Green Future Search Limited, "we", "us" or "our" in this privacy policy).

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact us in the following ways:

Registered Company Name: Green Future Search Limited

Registered Company Number: 14966451

Postal address: Green Future Search Limited, 8 Eastway, Sale, Cheshire, United Kingdom, M33 4DX

Contact email: suzanne@greenfuturesearch.com

Contact number: +44 7967 968382



You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 6 April 2024. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. The data we collect about you:

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, nationality and gender.
- **Contact Data** includes addresses, email addresses and telephone numbers.
- **Identification Data** includes copies of passports where we are required to hold such for identification purposes or eligibility to work status or for arrangement of travel to an interview.



- **Employment Data** includes, education, employment history including job roles and dates, skills and preferences, and location of current workplace, salary, annual leave, pensions and benefits entitlement.
- **Records of your interactions with us** includes emails, telephone conversations, other correspondence and your instructions to us.
- **Recruitment Data** includes reference details and other information included in a CV, cover letter or as part of the application process and activities including information about interviews, job applications and offers. Details of any new position including position title, company name, start date and salary.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Special Categories Data** where required by our clients for specialist assignments and for the screening purpose of suitability for a role or as defined by local laws, in order to comply with employment rights and obligations, data of a sensitive personal nature may be processed by Green Future Search Limited or their authorised External Providers. In such circumstances, and where it is legally required, where you have entered into a contract with Green Future Search Limited or where you have expressed interest in a particular role that requires it, the sensitive data processed may incorporate information relating to your:
 - Physical or mental health conditions, including medical reports or results of any assessments such as alcohol or drug screening
 - Vaccination status (including COVID-19 vaccination status and evidence) relating to the location, role or project
 - Racial or ethnic origin
 - Results of criminal record checks



- Financial background checks

If we do decide to process your **Special Categories Data** the condition for processing would be explicit consent, this can be withdrawn at any time by contacting us.

Additional data collected from clients:

- **Company data** including legal entity, registered address, registered company number.
- **Contact data** including full name, position, employment location address, email address and contact number of the person of authority to carry out and deliver the service to.
- **Financial Data** includes bank account and payment details, VAT number.
- **Transaction Data** includes details about payments to and from you as the client and other details of services you have purchased from us.

Diversity Data, we uphold the highest standards of integrity throughout all our interactions and processes and commit to ensuring that all candidates, clients and external providers are treated with the utmost respect and dignity. We ensure that all our recruitment practices are aligned with our approach to equal opportunities. In addition to the Special Categories Data defined above processed for legal/contractual purposes, we will where appropriate or required by our clients to comply with their own obligations and accordance with local laws and requirement process diversity information, on an anonymised basis to evaluate our commitment to equality and diversity. This may include information about your ethnic background, gender, disability, age, sexual orientation, religion or social-economic background.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

If you fail to provide personal data: Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter with



you (for example, to provide you with services). In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, contact details by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our services
 - subscribe to our service or publications
 - evaluation of services such as customer surveys
 - request marketing to be sent to you
 - send us your CV
 - give us feedback or contact us
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:
 - (a) analytics providers such as Google based outside the UK
 - (b) search information providers such as Linked-In or other industry job sites based inside **OR** outside the UK
 - (c) researched from publicly available information such as industry newsletters, government publications or industry white papers or similar publications or media.
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.



4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer (candidate/client/external provider)	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your service as a client/external provider including: (a) Manage payments, fees and charges	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)



(b) Collect and recover money owed to us	(e) Marketing and Communications	
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)



To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our services and grow our business)
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Our Candidate Recruitment Services

Green Future Search Limited may use your Personal Data to contact you to discuss a potential role and promote your skills and expertise in line with your requirements. We may also use this data to assist in assessing your suitability for the role, for example by confirming your eligibility to work status, obtaining references, or checking qualifications that are specific to the position you are interested in.

A record of our discussions and details of your CV will be retained on our database. Your CV details will be shared with our clients as part of our search and selection process. CV's are formatted before submission to remove any sensitive data and ensure that Personal Data is kept to a minimum, so the CV showcases your skills and expertise. We do not change the wording of your CV, other than omitting such Personal Data.

If you are successful in securing a position, we will maintain some limited Personal Data and Employment Data on file. If you are unsuccessful, we will maintain some limited Personal Data including CV to contact you with regards to future vacancies.

Our Client Partnerships

In order to maintain a high level of service and understanding of our client's business and needs we will retain client contact information for continued future partnerships. This includes information provided by your organisation when entering into a contract with Green Future Search Limited or information that is shared with Green Future Search Limited when seeking staffing solutions at special events or available to Green Future Search Limited through previous placement as a Candidate.



Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you **OR** by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase or experience.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please refer to our cookie policy.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.



5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table [*Purposes for which we will use your personal data*] above.

- External Third Parties as set out in the [*Glossary*].
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We share your personal data within Green Future Search Limited based in the UK. However, as our clients or external third parties have business entities that are based outside the UK so for the purposes defined in the privacy notice, including applicable regulatory, statutory, or contractual purposes, we may be required to process your personal data that will involve a transfer of data outside the UK. This may include those in countries outside of the European Economic Area (EEA)

Whenever we transfer your personal data out of the UK, by means of access and/or use for provision of services, we ensure a similar degree of protection and privacy is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by ensuring data agreements are in place.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK, in line with EU Model Clauses
- Stipulating that security of data and transfer practices as part of the services
- Partnering only with third parties or clients that have either UK or EEA business entities and as such have implementation of relevant data protection laws and obligations.



Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available by contacting us **OR** set out in the table [*Purposes for which we will use your personal data*] above.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- Request access to your personal data.
- Request correction of your personal data.



- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess



our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

External Third Parties

- Service providers acting as processors based in the United States of America or United Kingdom, who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in United Kingdom who provide banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities [acting as processors or joint controllers] based in the United Kingdom who require reporting of processing activities in certain circumstances].

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal



data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful, but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

