

PRIVACY POLICY

Company Name:	Wilson & Sterling Consulting Limited - WSC
Document:	Privacy Policy
Topic:	Data Protection
Version:	2021
Date:	August 2021

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Introduction

Wilson & Sterling Consulting Limited (company registration number: **13547593**) (“AV”, “we”, “us” or “our”) is a niche large enterprise healthcare and technology focused recruitment and staffing business that sources niche healthcare and technology talent for some of the world’s biggest corporations.

WSC is headquartered in London, United Kingdom. WSC is committed to protecting the privacy of our Candidates, Clients and Website Users in accordance with all data protection legislation, including but not limited to the Data Protection Act 2018, the General Data Protection Regulation (EU) 2016/679) of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation) and any national laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and any successor legislation to the GDPR or the Data Protection Act 2018, as well as other national legislation based on the locations of our offices.

This Privacy Policy explains what we do with your personal data, whether we are in the process of helping you find a job, continuing our relationship with you once we have found you a role, providing you with a service, receiving a service from you, using your data to ask for your assistance in relation to one of our Candidates, or you are visiting our website. It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

For the purpose of the GDPR, the company responsible for your data is Wilson & Sterling Consulting Limited, 3 Waterhouse Square 138 - 142 Holborn London Holborn, London, England, EC1N 2SW .It is important to point out that we may amend this Privacy Policy from time to time. Please check regularly if you want to stay up to date, as we will post any changes here.

This Privacy Policy was last updated in October 2021. If you are dissatisfied with any aspect of our Privacy Policy, you may have legal rights and, where relevant, we have described these as well. This Privacy Policy incorporates the highest standards and applies in all relevant countries throughout our international network.

This allows us to ensure that we're complying with all applicable data privacy protections, no matter where you are.

Definitions

Affiliate: Any holding company and subsidiary of Wilson & Sterling Consulting Limited as defined by the Companies Act 2006.

Candidates: All Applicants for roles advertised or promoted by WSC, including permanent, part-time and temporary positions and freelance roles with WSC's Clients; as well as people who

have supplied a speculative CV to WSC which does not relate to a specific job. Individual contractors, freelance workers and employees of Suppliers or other third parties who put forward for roles with WSC, Clients as part of an MSP offering or otherwise will be treated as candidates for the purposes of this Privacy Policy.

Clients: WSC's customers, clients, and others to whom WSC provides services in the course of its business.

Delete: While we will endeavour to permanently erase your personal data once it reaches the end of its retention period or where we receive a valid request from you to erase it, some of your personal data may still exist within our Systems, for example, if it is waiting to be overridden. We however ensure that your personal data is "put beyond use", meaning that while the data technically exists on an archive System, it cannot be readily accessed by any of our operational Systems, processes or members of Staff. Further, it may be necessary for AC to retain personal data for legal, regulatory, risk management and/or auditing purposes.

General Data Protection Regulation (GDPR): A European Union statutory instrument which aims to harmonise European data protection laws. It came into effect on 25 May 2018, and any references to it should be construed accordingly to include any national legislation implementing it.

Managed Service Provider (MSP): Clients' outsourcing of the management of external staff (including freelance workers, independent contractors and temporary employees) to an external provider.

Recruitment Process Outsourcing (RPO) services: Full or partial outsourcing of the recruitment process for permanent employees to a recruitment provider.

Staff All: current and former employees and interns engaged directly in the business of WSC (or who have accepted an offer to be engaged) as well as certain other workers who are or were engaged in the business of providing services to WSC (even though they are not classed as employees). For these purposes we also include employees of WSC who are engaged to work on Clients' premises under the terms of RPO or MSP agreements. For the avoidance of doubt,

'Staff' does not include individuals hired by WSC for the purpose of being placed with Clients outside of an RPO/MSP arrangement. These individuals are treated in the same way as WSC's Candidates and are covered by this Privacy Policy. Likewise, independent contractors and consultants performing services for WSC fall within the definition of a 'Supplier' for the purposes of this Privacy Policy.

Suppliers: Partnerships and companies (including sole traders), and atypical workers such as independent contractors and freelance workers, who provide services to WSC. In certain circumstances, WSC will sub-contract the services it provides to Clients to third-party suppliers who perform services on WSC's behalf. In this context, suppliers that are individual contractors, freelance workers, or employees of suppliers will be treated as Candidates for data protection purposes. Please note that in this context, WSC requires Suppliers to communicate the relevant parts of this Privacy Policy (namely the sections directed at Candidates) to their employees.

Systems: Telephone, computer, internet and Wi-Fi systems, software and portals, accounts and/or networks belonging, controlled or used by WSC that are used to transmit, undertake and/or receive communications or are otherwise used in the course of WSC's business, including candidate portal software and CRM systems.

Website Users: Any individual who accesses any of the WSC's websites.

What Kind of Personal Data does WSC collect?

The below information is in addition to any personal data WSC is required by law to process in any given situation.

Candidate Data Depending on the relevant circumstances and applicable local laws and requirements, WSC may collect some or all of the information listed below to enable us to offer you employment opportunities tailored to your circumstances and your interests. In some jurisdictions, we are restricted from processing some of the data outlined below. In such cases, we will not process the data in those jurisdictions:

- Name;
- Age/date of birth;
- Sex/gender;
- A copy of your driving licence and/or passport/identity card;
- Nationality/citizenship/place of birth and immigration status (whether you need a work permit);
- Diversity information including racial or ethnic origin, religious or other similar beliefs, and physical or mental health, including disability-related information;
- Photograph;
- Details of any criminal record if this is required for a role that you are interested in applying for;
- Marital status;
- Contact details of yourself, your emergency contacts and dependants;
- Education including referee details;
- Employment history including details about your current remuneration, pensions and benefits arrangements;
- Information on your interests and needs regarding future employment, both collected directly and inferred, for example from jobs viewed or articles read on our website;
- Financial information (where we need to carry out financial background checks);
- Social security number (or equivalent in your country) and any other tax- related information;
- IP address(es);
- The dates, times and frequency with which you access our services;
- Extra information that you choose to tell us;
- Extra information that your referees choose to tell us about you;
- Extra information that our Clients may tell us about you, or that we find from other third-party sources such as job sites; Please note that the above list of categories of personal data we may collect is not exhaustive.

II. Client Data WSC only collects a very limited amount of Client data. This usually entails:



- Contact details;
- Details of individual contacts in the Client-organisation, such as names, telephone numbers and email addresses;
- Details regarding your online engagement with Candidate profiles and other material published by WSC;
- Extra information someone in your organisation has chosen to provide us with. We collect Client data to ensure that our relationship runs smoothly and that our marketing communications are relevant and timely. Please note that the above list of categories of personal data we may collect is not exhaustive.

III. Supplier Data WSC only collects a very limited amount of Supplier data. This usually entails:

- Details for our contracts within your organisation, such as names, telephone numbers and email addresses;
- Bank details;
- Extra information someone in your organisation has chosen to provide us with. We collect Supplier data to ensure that our relationship runs smoothly.

Please note that the above list of categories of personal data we may collect is not exhaustive.

IV. Individuals whose Personal Data we receive from Candidates and Staff, such as Referees, Emergency Contacts and Dependants Information we receive from Referees is only a confirmation of Candidate or Staff personal data we already have on file. We further store names and contact details about the referees. Information we receive concerning emergency contacts usually contain names and contact details. Information concerning dependants usually includes names, date of birth, contact details and potentially some health information if a member of our Staff has put you down as a dependant or any other kind of beneficiary for a benefit connected with their employment or if a member of our Staff exercises certain employment rights. Please note that the above list of categories of personal data we may collect is not exhaustive.

V. Website Users WSC only collects a very limited amount of Website Users data. The data help us to improve your experience when using our website and help us manage the services we provide. The data we collect include:

- Information on how you use our website;
- The frequency with which you access our website;
- Your browser type;
- The location you view the website from;
- The language you choose to view it;
- The times our website is the most popular;
- Any information you provide us with in case you contact us through our website (i.e. name and contact details). Please note that the above list of categories of personal data we may collect is not exhaustive. How does WSC collect Personal Data?

I. Candidate-related Personal Data we collect Candidate-related personal data in two primary ways:

1. Personal data that the Candidate provides to us; and
2. Personal data relating to the Candidate we receive from other sources.

3. Personal data you provide us with WSC needs to know certain information about you in order to provide a tailored service. This will enable us to provide you with the best opportunities, and should save you time in not having to trawl through information about jobs and services that are not relevant to you. There are numerous ways you can share your information with us. It all depends on what suits you. These may include:

- Entering your details on WSC's website or via an application form, as part of the registration process;
 - Leaving a hard copy CV at a WSC's recruitment event, job fair or office;
 - Emailing your CV to a WSC consultant or being interviewed by them;
 - Applying for jobs through a job aggregator, which then redirects you to WSC's website;
 - Entering your personal details into a WSC microsite;
- or
- Entering a competition through a social media channel such as LinkedIn, Facebook or Twitter (or similar).

2. Candidate-related Personal Data we receive from Other Sources WSC also receives Candidate-related personal data from other sources. Depending on the relevant circumstances and local applicable laws, these may include the following situations:

- Candidate data shared with us by our Clients;
- Through a search via job sites such as LinkedIn;
- If you "like" our social media pages (or perform a similar transaction), personal data may be transmitted from these third-party sources;
- If you were referred to us through an RPO or an MSP Supplier, personal data may be shared with us by the providers.

Please note that the above list of categories of personal data we may collect is not exhaustive.

II. Client Data We collect Client-related personal data in two ways:

1. Personal data that the Client provides to us; and
2. Personal data relating to the Client we receive from other sources.
3. Personal data you provide us with

In order to provide you with the best service possible and successfully help you with your staffing requirements, we may receive data directly from you in two ways:

- Where you contact us proactively; and/or
- Where we contact you, either by telephone or via email, or through our consultants' Business development activities more generally.

2. Client-related Personal Data to the we receive from other Sources: where appropriate and in accordance with any local laws and requirements, we may seek more information about you or your colleagues from other sources, generally by way of due diligence or other market intelligence including:

- From third-party market research and by analysing online and offline media (which we may do ourselves, or employ other organisations to do for us);
- From delegate lists at relevant events; and

- From other limited sources and third parties (for example from our Candidates to the extent that they provide us with your details to act as a referee for them). Please note that the above list of categories of personal data we may collect is not exhaustive.

III. Website Users:

We automatically collect certain information from our Website Users, whether or not they decide to ultimately use our services. These include:

- IP addresses;
- Dates, times and the frequency with which they access the website;
- The way the content is browsed; and
- Any data which is provided to us via a contact feature on our website (e.g. the chat function). Please note that the above list of categories of personal data we may collect is not exhaustive. We collect your data automatically via cookies, in line with your browser cookie setting and our Cookie Policy. If you are also a Candidate or Client, we may collect your personal data in accordance with the parameters above.

Why does WSC Collect your Personal Data and how is it Used?

Having obtained data about you, we use it in a number of ways:

I. Candidate Data We generally use Candidate Data in five ways:

1. Recruitment activities;
2. Marketing activities;
3. Equal opportunities monitoring;
4. To help us establish, exercise or defend legal claims; and
5. In relation to the Conduct of Employment Agencies and Employment Business Regulations 2003, as amended.

1. Recruitment Activities WSC's main business activities relate to recruitment – i.e. finding the right position for our Candidates. Where appropriate and in accordance with local laws and requirements, we use and process your personal data as follows:

- Collecting your data from you and other sources, such as LinkedIn;
- Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to provide recruitment services;
- Providing you with our recruitment services and to facilitate the recruitment process;
- Assessing data about you against vacancies which we think may be suitable for you;
- Sending your information to Clients, in order to apply for jobs or to assess your eligibility for jobs;
- Enabling you to submit your CV, apply online for jobs or to subscribe to alerts about jobs we think may be of interest to you;
- Allowing you to participate in specialist online training;
- Allowing you to participate in the interactive features of our services, when you choose to do so;
- Carrying out our obligations arising from any contracts entered into between us;
- Carrying out our obligations arising from any contracts entered into between WSC and third parties in relation to your recruitment;
- Facilitating our payroll and iAccounting processes;
- Carrying out customer satisfaction surveys;

- Verifying details you have provided or requesting information (such as references, qualifications and potentially any criminal convictions, to the extent that this is appropriate and in accordance with local laws);
- Complying with our legal obligations in connection with the detection of crime or the collection of taxes or duties;
- Enabling us to send you targeted, relevant marketing materials or other communications which we think are likely to be of interest to you; and We may use your personal data for the above purposes if we deem it necessary to do so for our legitimate interests. If you want to know more about what this means, please see below. If you are not happy about this, in certain circumstances you have the right to object and can find out more about how and when to do further below.

2. Marketing Activities: We may periodically send you information that we think you may find interesting, or to ask for your help with connecting other Candidates with jobs. In particular, we may wish to use your data for the purposes listed below, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive. Sending you marketing information may help to:

- enable us to develop and market other products and services;
- market our full range of recruitment services (permanent, temporary, contract, outplacement, MSP programmes and RPO services) to you;
- send you details of reports, promotions, offers, networking and client events, and general information about the industry sectors which we think might be of interest to you;
- display promotional excerpts from your details on WSC's website(s) as a success story (only where we have obtained your express consent to do so); and
- provide you with information about certain discounts and offers that you are eligible for by virtue of your relationship with WSC. We need your consent for some aspects of these activities which are not covered by our legitimate interests (in particular, the collection of data via cookies, and the delivery of direct marketing to you through digital channels) and, depending on the situation, we'll ask for this via an opt-in or soft-opt-in (which we explain further below). Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements.

Soft opt-in consent is a specific type of consent which applies where you have previously engaged with us (for example by submitting a job application or CV, or registering a vacancy to be filled), and we are marketing other recruitment-related services. Under 'soft opt-in' consent, we will take your consent as given unless or until you opt out. For most people, this is beneficial as it allows us to provide you with information that we think will be of interest to you and suggest other jobs to you alongside the specific one you applied for, significantly increasing the likelihood of us finding you a new position. For other types of e-marketing, we are required to obtain your explicit consent. If you are not happy about our approach to marketing, you have the right to withdraw your consent at any time. We want to let you know that even if you have opted out from our marketing communications through our preference centre, it is possible that your details may be recaptured through public sources in an unconnected marketing campaign. We will try to make sure this doesn't happen, but if it does, we're sorry.

We'd just ask that in those circumstances you opt out again.



3. Equal Opportunities Monitoring: We are committed to ensuring that our recruitment processes are aligned with our approach to equal opportunities. Some of the data we may (in appropriate circumstances and in accordance with local law and requirements) collect about you comes under the umbrella of “diversity information”. This could be information about your ethnic background, gender, disability, age, sexual orientation, religion or other similar beliefs, and/or social-economic background. Where appropriate and in accordance with local laws and requirements, we’ll use this information on an anonymized basis to monitor our compliance with our equal opportunities policy.

We may also disclose this (suitably anonymized where relevant) data to Clients where this is contractually required or the Client specifically requests such information to enable them to comply with their own employment processes. This diversity information is what is called ‘sensitive’ or ‘special category’ personal information and slightly stricter data protection rules apply to it. We therefore need to obtain your explicit consent before we can use it. We’ll ask for your consent by offering you an opt-in. This means that you have to explicitly and clearly tell us that you agree to us collecting and using this information. We may collect other sensitive/special category personal data about you, such as health-related information, religious affiliation, or details of any criminal convictions if this is appropriate in accordance with local laws and is required for a role that you are interested in applying for. We will never do this without your explicit consent unless we have another valid legal basis to do so. Please note that in certain of the jurisdictions in which we operate, different rules apply to this sensitive/special category data. If you are not happy about this, you have the right to withdraw your consent at any time.

4. Establishing, exercising or defending Legal Claims: In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

5. In relation to the Conduct of Employment Agencies and Employment Business Regulations 2003 (“the Conduct Regulations”), as amended. We may collect your data for internal record keeping in relation to the Conduct Regulations, as amended. If applicable, we are obliged to keep a record of your information for a period of at least one year after the date on which we last provided services to you in the course of our business.

II. Client Data: We generally use Client Data in three ways:

1. Recruitment Activities;
2. Marketing Activities; and
3. To help us to establish, exercise or defend legal claims.
4. Recruitment Activities WSC’s main business activities relate to recruitment through
 - i. providing you with Candidates
 - ii. RPO services; and
 - iii. MSP programmes In order to facilitate this, we are storing your data in the following ways:

- Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to recruitment activities;
- Keeping records of our conversations and meetings, so that we can provide targeted services to you;
- Undertaking customer satisfaction surveys; and



- Processing your data for the purpose of targeting appropriate marketing campaigns.

We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests. If you are not happy about this, in certain circumstances you have the right to object.



2. Marketing Activities Subject to any applicable local laws and requirements, we will not, as a matter of course, seek your consent when sending marketing materials to a corporate postal or email address. If you are not happy about this, you have the right to opt out of receiving marketing materials from us. Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding marketing activities.

3. Establishing, exercising or defending Legal Claims In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

III. Supplier Data: We will only use your information:

- to store (and update when necessary) your details on our database, so that we can contact you in relation to our agreements;
- to offer services to you or to obtain support and services from you;
- to perform certain legal obligations;
- to help us to target appropriate marketing campaigns; and
- in more unusual circumstances, to help us to establish, exercise or defend legal claims.

We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests. We will not, as a matter of course, seek your consent when sending marketing messages to a corporate postal or email address. If you are not happy about this, in certain circumstances you have the right to object. Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements.

IV. Individuals whose data we receive from Candidates and Staff, such as Referees and Emergency Contacts and Dependents We will only use the information that our Candidate gives us about you for the following purposes:

- If our Candidates or Staff members put you down on our form as an emergency contact, we'll contact you in the case of an accident or emergency affecting them; or
- If you were put down by a Staff member as a next of kin or dependant or any other kind of beneficiary, we will store your personal data to ensure the personnel records of that Staff member are correct, and use your personal data where necessary to provide employee benefits and pay remuneration and disclose your data to the relevant benefits provider.
- If you were put down by our Candidate or a prospective member of Staff as a referee, we will contact you in order to take up a reference. This is an important part of our quality assurance process, and could be the difference between the individual getting a job or not.
- If you were put down by our Candidate or a prospective member of Staff as a referee, we may sometimes use your details to contact you in relation to recruitment activities that we think may be of interest to you, in which case we will use your data for the same purposes for which we use the data of Clients.
- We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests or in accordance with applicable employment law. If you are not happy about this, you have the right to object.

Website Users: We use your data to help us to improve your experience of using our website, for example by analysing your recent job search criteria to help us to present jobs or Candidates to you that we think you'll be interested in. If you would like to find out more about cookies, including how we use them and what choices are available to you, please have a look at our Cookie Policy.



How do we Safeguard your Personal Data?

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures. These include measures to deal with any suspected data breach. If you suspect any misuse or loss of or unauthorised access to your personal information please let us know immediately. Details of how to contact us can be found further below. Who do we Share your Personal Data with? Where appropriate and in accordance with local laws and requirements, we may share your personal data, in various ways and for various reasons, with the following categories of people:

- Any of our group companies;
- Individuals and organisations who hold information related to your reference or application to work with us, such as current, past or prospective employers, educators and examiningbodies, employment and recruitment agencies;
- Tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this data (for example, because of a request by a tax authority or in connection with any anticipated litigation);
- Third party service providers who perform functions on our behalf (including external consultants, business associates and professional advisers such as lawyers, auditors and accountants, technical support functions and IT consultants carrying out testing anddevelopment work on our business technology systems);
- Third party outsourced IT- and document storage providers where we have an appropriate processing agreement (or similar protections) in place;
- Marketing technology platforms and suppliers;
- In the case of Candidates: potential employers and other recruitment agencies/organisations to increase your chances of finding employment/third party partners, job boards and job aggregators where we consider this will improve the chances of finding you the right job and MSP suppliers as part of our clients' MSP programmes;
- In the case of Candidates and our Candidates' and prospective members of Staff's referees: third parties who we have retained to provide services such as reference, qualification and criminal coACictions checks, to the extent that these checks are appropriate and in accordancewith local laws;
- If WSC merges with or is acquired by another business or company in the future, (or is in meaningful discussions about such a possibility) we may share your personal data with the (prospective) new owners of the business or company. How long do we keep your Personal Data for?

We will Delete your personal data from our systems if we have not had any meaningful contact with you (or, where appropriate, the company you are working for or with) for three years (or for such longer period as we believe in good faith that the law or relevant regulators require us to preserve your data). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected. When we refer to "meaningful contact", we mean, for example, communication between us (either verbal or written), or where you are actively engaging with our online services. If you are a Candidate, we will consider there to be meaningful contact with you if you submit your updated CV onto our website or take part in any of our online training. We will also consider it meaningful contact if you communicate with us about potential roles, either by verbal or written communication or click through from any



of our marketing communications. Your receipt, opening or reading of an email or other digital message from us will not count as meaningful contact – this will only occur in cases where you click-through or reply directly.

How can you Access, Amend or Take Back the Personal Data that you have given to Us?

One of the GDPR's main objectives is to protect and clarify the rights of EU-citizens and individuals in the EU with regards to data privacy. This means that you retain various rights in respect of your data, even once you have given it to us. These are described in more detail below. To get in touch about these rights, please contact us. We will seek to deal with your request without undue delay, and in any event within one month (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues which you raise.

I. Right to Object to Processing: This right enables you to object to us processing your personal data where we do so for one of the following four reasons:

- (i) our legitimate interests;
- (ii) to enable us to perform a task in the public interest or exercise official authority;
- (iii) to send you direct marketing materials; and
- (iv) for scientific, historical, research, or statistical purposes.

The "legitimate interests" and "direct marketing" categories above are the ones most likely to apply to our Website Users, Candidates, Clients and Suppliers. If your objection relates to us processing your personal data because we deem it necessary for your legitimate interests, we must act on your objection by ceasing the activity in question unless:

- we can show that we have compelling legitimate grounds for processing which overrides your interests; or
- we are processing your data for the establishment, exercise or defence of a legal claim. If your objection relates to direct marketing, we must act on your objection by ceasing this activity.

II. Right to Withdraw Consent Where we have obtained your consent to process your personal data for certain activities (for example, for our marketing arrangements), you may withdraw this consent at any time and we will cease to carry out the particular activity that you previously consented to unless we consider that there is an alternative reason to justify our continued processing of your data for this purpose in which case we will inform you of this condition.

III. Data Subject Access Request (DSAR) You may ask us to confirm what information we hold about you at any time, and request us to modify, update or Delete such information. We may ask you to verify your identity and for more information about your request. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is "manifestly unfounded or excessive". If you request further copies of this information from us, we may charge you a reasonable administrative cost where legally permissible. Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will always tell you the reasons for doing so. Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding data subject access requests and may refuse your request in accordance with such laws. IV. Right to Erasure You have the right to request that we erase your personal data in certain circumstances. Normally, the information must meet one of the following criteria:

- the data are no longer necessary for the purpose for which we originally collected and/or processed them;

- where previously given, you have withdrawn your consent to us processing your data, and there is no other valid reason for us to continue processing;
- the data has been processed unlawfully (i.e. in a manner which does not comply with the GDPR);
- it is necessary for the data to be erased in order for us to comply with our legal obligations as a data controller; or
- if we process the data because we believe it necessary to do so for our legitimate interests, you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing. Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding data subject right to erasure and may refuse your request in accordance with local laws.

We would only be entitled to refuse to comply with your request for one of the following reasons:

- to exercise the right of freedom of expression and information;
 - to comply with legal obligations or for the performance of a public interest task or exercise of official authority;
- for public health reasons in the public interest;
- for archival, research or statistical purposes; or
 - to exercise or defend a legal claim. When complying with a valid request for the erasure of data we will Delete the relevant data. V. Right to Restrict Processing You have the right to request that we restrict our processing of your personal data in certain circumstances. This means that we can only continue to store your data and will not be able to carry out any further processing activities with it until either:
 - (i) one of the circumstances listed below is resolved;
 - (ii) you consent; or
 - (iii) further processing is necessary for either the establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of important EU - or Member State public interest.

The circumstances in which you are entitled to request that we restrict the processing of your personal data are:

- where you dispute the accuracy of the personal data that we are processing about you. In this case, our processing of your personal data will be restricted for the period during which the accuracy of the data is verified;
- where you object to our processing of your personal data for our legitimate interests. Here, you can request that the data be restricted while we verify our grounds for processing your personal data;
- where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it; and
- where we have no further need to process your personal data but you require the data to establish, exercise, or defend legal claims. If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or it involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.

VI. Right to Rectification You also have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or iAColves disproportionate effort. Where appropriate, we will also tell you which third parties we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.

VII. Right to Data Portability You further have the right to transfer your personal data between data controllers. In effect, this means that you are able to transfer your WSC account details to another online platform. To allow you to do so, we will provide you with your data in a commonly used machine-readable format that is password-protected so that you can transfer the data to another online platform.

Alternatively, we may directly transfer the data for you. This right of data portability applies to: (i) personal data that we process automatically (i.e. without any human intervention); (ii) personal data provided by you; and

(iii) personal data that we process based on your consent or in order to fulfil a contract.

(iv) Right to lodge a Complaint with a Supervisory Authority You also have the right to lodge a complaint with your local supervisory authority. If you would like to exercise any of these rights, or withdraw your consent to the processing of your personal data (where consent is our legal basis for processing your personal data), please contact us. Please note that we may keep a record of your communications to help us resolve any issues which you raise. You may ask to unsubscribe from job alerts and any other marketing communications from us at any time. Please reach out to us via the contact details on our website. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the period for which we hold your data.

Who is responsible for Processing your Personal Data on WSC's Website?

The WSC entity responsible for processing the personal data of Website Users, Candidates, Clients and Suppliers depends on where you use WSC's services or supply WSC with services. The WSC entity responsible for processing the personal data of Website Users, Candidates, Clients and Suppliers in the UK is Wilson & Sterling Consulting Limited. How do we Store and Transfer your Personal Data Internationally? In order to provide you with the best service and try to carry out the purpose described in this Privacy Policy, your data may be transferred:

- Between and within WSC entities;
- to third parties (such as advisers or other Suppliers to the WSC business);
- to overseas Clients;
- to Clients within your country who may, in turn, transfer your data internationally; and
- to a cloud-based storage provider. We want to make sure that your data are stored and transferred in a way which is secure.

We will therefore only transfer data outside of the European Economic Area or EEA (i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein) where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, for example:



- by way of data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by data controllers in the EEA to data controllers and processors in jurisdictions without adequate data protection laws; or
- by signing up to the EU-U.S. Privacy Shield Framework for the transfer of personal data from entities in the EU to entities in the United States of America or any equivalent agreement in respect of other jurisdictions; or
- transferring your data to a country where there has been a finding of adequacy by the European Commission in respect of that country's levels of data protection via its legislation; or
- where it is necessary for the conclusion or performance of a contract between ourselves and a third party and the transfer is in your interests for the purposes of that contract (for example, if we need to transfer data outside the EEA in order to meet our obligations under that contract if you are a Client of ours); or
- where you have consented to the data transfer. To ensure that your personal information receives an adequate level of protection, we have put in place appropriate procedures with the third parties we share your personal data with to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the law on data protection. Our Legal Basis for Processing your Data We process your data in on one or more out of the following legal bases:

Legitimate Interests Article 6(1)(f) of the GDPR is the one that is relevant here – it says that we can process your data where it "is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data." We don't think that any of the following activities prejudice individuals in any way – in fact, they help us to offer you a more tailored, efficient service, so everyone's a winner! However, you do have the right to object to us processing your personal data on this basis. If you would like to know more about how to do so, please see above.

Please note that in certain of the jurisdictions in which we operate, a different legal basis for data processing might apply in certain cases.

Candidate Data We think it is reasonable to expect that if you are looking for employment or have posted your professional CV information on a job board or professional networking site, you are happy for us to collect and otherwise use your personal data to offer or provide our recruitment services to you, share that information with prospective employers and assess your skills against our bank of vacancies. Once it is looking like you may get the job, your prospective employer may also want to double check any information you have given us (such as the results from psychometric evaluations or skills tests) or to confirm your references, qualifications and criminal record, to the extent that this is appropriate and in accordance with local laws.

We need to do these things so that we can function as a profit-making business, and to help you and other Candidates get the jobs you deserve. We want to provide you with tailored job recommendations and relevant articles to read to help you on your job hunt. We therefore think it's reasonable for us to process your data to make sure that we send you the most appropriate content. We also think that it might help with your job search if you take part in

our specialist online training or some of our more interactive services, if you have the time. These are part of our service offering as a business, and help differentiate us in a competitive marketplace, so it is in our legitimate interests to use your data for this reason. We have to make sure our business runs smoothly, so that we can carry on providing services to Candidates like you. We therefore also need to use your data for our internal administrative activities, like payroll and iACoicing where relevant. We have our own obligations under the law, which it is a legitimate interest of ours to insist on meeting! If we believe in good faith that it is necessary, we may therefore share your data in connection with crime detection, tax collection or actual or anticipated litigation.

2. Client Data To ensure that we provide you with the best service possible, we store your personal data and/or the personal data of individual contacts at your organisation as well as keeping records of our coACersations, meetings, registered jobs and placements. From time to time, we may also ask you to undertake a customer satisfaction survey. We think this is reasonable – we deem these uses of your data to be necessary for our legitimate interests as an organisation providing various recruitment services to you.

3. Supplier Data We use and store the personal data of individuals within your organisation in order to facilitate the receipt of services from you as one of our Suppliers. We also hold your financial details, so that we can pay you for your services. We deem all such activities to be necessary within the range of our legitimate interests as a recipient of your services.

4. Individuals whose Data we Receive Candidates and Staff, such as Referees and Emergency Contacts If you have been put down by a Candidate or a prospective member of Staff as one of their referees, we use your personal data in order to contact you for a reference. This is a part of our quality assurance procedure and so we deem this to be necessary for our legitimate interests as an organisation offering recruitment services and employing people ourselves. If a Candidate or Staff member has given us your details as an emergency contact, we will use these details to contact you in the case of an accident or emergency. We are sure you will agree that this is a vital element of our people-orientated organisation, and so is necessary for our legitimate interests.

II. Consent: In certain circumstances, we are required to obtain your consent to the processing of your personal data in relation to certain activities. Depending on exactly what we are doing with your information, this consent will be opt-in consent or soft opt-in consent. Article 4(11) of the GDPR states that (opt-in) consent is "any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her." In plain language, this means that:

- you have to give us your consent freely, without us putting you under any type of pressure;
- you have to know what you are consenting to – so we'll make sure we give you enough information;
- you should have control over which processing activities you consent to and which you don't. We provide these finer controls within our privacy preference centre; and
- you need to take positive and affirmative action in giving us your consent – we're likely to provide a tick box for you to check so that this requirement is met in a clear and unambiguous fashion. We will keep records of the consents that you have given in this way. We have already mentioned that, in some cases, we will be able to rely on soft opt-in consent. We are allowed to market products or services to you which are related to the recruitment services we provide to you as long as you do not actively opt-out from these communications.

Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding consenting to receive marketing materials. As we have mentioned, you have the right to withdraw your consent to these activities. You can do so at any time, and details of how to do so can be found further above.

III. Establishing, Exercising or Defending Legal Claims: Sometimes it may be necessary for us to process personal data and, where appropriate and in accordance with local laws and requirements, sensitive personal data in connection with exercising or defending legal claims. Article 9(2)(f) of the GDPR allows this where the processing "is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity". This may arise for example where we need to take legal advice in relation to legal proceedings or are required by law to preserve or disclose certain information as part of the legal process.

To Exercise our Rights or Carry out Employment or Social Security Law Obligations:

For some Candidates, and for individuals whose personal data is provided by Candidates and Staff, it will sometimes be necessary for us to process your sensitive/special category personal data. Article 9(2)(b) of the GDPR allows us to do this where the processing is "necessary for the purposes of carrying out the obligations and exercising [our or your] specific rights... in the field of employment and social security and social protection law", as long as this is allowed by law. We process Candidates sensitive/special category personal data for the purpose of ensuring our compliance with our equal opportunities obligations where this is in accordance with local law, (for example, for some Candidates during the course of the recruitment process).

We may also process the sensitive/special category personal data of individuals connected with Candidates or Staff for other reasons, for example to allow the relevant Staff member to access certain benefits or employment rights. You can find out how we process your sensitive/special category personal data under "What Kind of Personal Information Do We Collect?" above. Cookies Policy Please refer to our Cookie Policy which can be found on our website in reference to

- what a cookie is; and
- how we use cookies.

How to Contact Us?

You can get in touch with us at any time:

- in order to access, amend or take back the personal data you have provided us with;
- if you suspect any misuse or loss of or unauthorised access to your personal information;
- in order to withdraw your consent to the processing of your personal data (where consent is the legal basis on which we process your personal data);
- to share any comments or suggestions concerning this Privacy Policy; and
- any other reason you find under this Privacy Policy.

While we hope there is no need to, if you would like to complain about our use of your personal information, please send an email detailing your complaint to our Data Protection Officer at

the following address: 3 Waterhouse Square 138 - 142 Holborn London Holborn,
London, England, EC1N 2SW

Alternatively, you can send an email to:

Omid Saadati

Omid@wilson-serling.com

Further, you can reach us by phone under :+44 (0) 208 089 8004

We take privacy seriously so we will get back to you as soon as possible.

You also have the right to file a complaint with the relevant supervisory authority:

Information Commissioner's Office

Wycliff House Water Lane Wilmslow Cheshire SK9 5AF

Telephone: +44 (0) 303 123 1113

E-Mail.: casework@ico.org.uk