

## **Introduction**

This Privacy Policy sets out the foundation on which all personal data that Cpl Resources plc and/or its subsidiary companies (the “Cpl Group”) collect from you, or that you provide to us (via several sources such as our own website, any other group affiliate websites, job boards, direct emails, social networks, and events) will be processed by us.

Read this policy carefully to understand Cpl’s practices relating to your personal data and how we will treat it.

If you do not accept that we process your data in the manner detailed in this Policy, please do not submit any personal data to us or please contact us to have your data removed (see contact details below)

## **The Controller of your Data**

The Cpl Group is registered as a data controller in the Republic of Ireland for the purposes of the General Data Protection Regulation (EU) 2016/679 of the European Parliament on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data. The Cpl Group will deal with the office of the Data Protection Commissioner in Ireland as the Lead Supervisory Authority for regulating all data protection matters within the Group. At the Cpl Group , we promise that all the data you send to us is processed fairly and lawfully, and with due skill and care. We will also commit to you that the data you submit is solely used in accordance with the purposes as set out in this policy.

## **Collection and Use of your Personal Information**

The Cpl Group collects and uses your personal information to perform the recruitment functions/services you have requested. We will collect Personal Data. Personal Data will generally consist of your name, contact details and other information contained in your CV. Cpl Group will confirm your consent for us to hold your personal information before it is stored and processed.

The Personal Data that we collect and process will vary depending on whether you are a Cpl Candidate, Cpl Employee, Third Party Supplier Candidate or Client Contact. Each of these is outlined below.

(i) Cpl Candidate

The Personal Data will be requested, stored, processed, used and disclosed by the Cpl Group to:

- Evaluate data about you against vacancies which we may have that we determine may be suitable for you. In line with the nature of recruitment services, we will keep your data on our database with your consent.
- Send your information to our clients to put you forward as a candidate for vacancies or to assess your eligibility for vacancies that we may have with your permission. When your information is sent to a client, we will automatically notify you by email when this has been done, to which client it has been shared and for what specific purpose so that you know where else your data has been submitted and stored.
- Permit you to submit your CV to apply online for jobs.
- Communicate with you about relevant job opportunities, provide career guidance and support, and request your feedback on your candidate experience.
- Where we have a bona fide requirement by law to disclose it to third parties in relation to the detection of crime, the collection of taxes or duties, in order to comply with any applicable law and court orders.
- Third-parties where we or our client have engaged them to deliver services that have been requested. These may include references, qualifications, criminal reference checking services and/or psychometric evaluation or skill tests. These will be advised to you as part of the process and you have the option to decline.

(ii) Cpl Employee

For people being employed and contracted by Cpl, additional Personal Data to Candidate Data is also required to facilitate employment, compliance and payment services, such as bank account details, national identification numbers, tax clearance and visa details. This data will only be held for as long as it is required to provide such employment services and will be deleted once your employment has finished and data is not required for any other legal purposes.

(iii) Cpl Contractor

For people being contracted by Cpl, additional Personal Data to Candidate Data is also required to facilitate employment, compliance and payment services, such as bank account details, national identification numbers, tax clearance and visa details. This data will only be held for as long as it is required to provide such employment services and will be deleted once your employment has finished and data is not required for any other legal purposes.

(iv) Third Party Supplier Candidate

In the fulfilment of some of our Client service contracts, we act as a Master Supplier for recruitment services which requires us to process candidate CVs and worker details from other recruitment providers on behalf of our client. In this case the data processed is specifically for this client's application/ placement and is not available or used for the purpose in section (i) of finding career opportunities for Cpl Candidates. If such a third party candidate is unsuccessful with their application, then the candidate details are removed from the system. Similarly, once the placement is completed, this personal data is removed from our systems

(v) Client Contact

To enable CPL to provide recruitment services to your employer, we will process and store client contacts details, which would include name, work contact details, job title and job activity history. Once added to our contact database, you will receive automatic notification of this and you will at all times have the ability to be deleted and/or to opt out from electronic communication

(vi) Marketing Contact

You may be added to our list of marketing contacts either as a marketing contact only or in addition to other contact types on this list. If you share your email address or other contact details with us and consent to receive marketing communication, we will use your personal data to communicate with you directly with useful information, advice, and support materials through email, messaging, or mobile/web notification. We will only contact you via methods that you approve directly and will only send you content that you have requested directly or consented to receive. As a marketing contact your data will be held only for as long as you consent to receive communication from us, you will always have the freedom to unsubscribe from some or all contact from every message.

This Personal Data list is not exhaustive and we may seek to process, use or disclose your information for any other purpose which has not been listed above always with your explicit consent.

We reserve the right to assign your data to a third party in the event of a sale, merger, liquidation, receivership or transfer of all the assets of our company in circumstances where the third party agrees to observe the terms of this Privacy Policy. The Cpl Group will notify you of such circumstances and you will be afforded an opportunity to opt-out.

### **Who Can Access your Data?**

The information that you have provided to us may be made available to personnel working in the Cpl Group, our affiliate companies, our clients, and the third parties as set out above. Your personal data is wholly stored and processed within the European Economic Area.

Where your personal information is required to be sent outside the European Economic Area we will contact you for your permission prior to the disclosure of your personal information. In the event that we need to transfer your personal information outside the European Economic Area we will take the appropriate steps to guarantee that your privacy rights continue to be protected as detailed in this Privacy Policy.

### **Existing Data Information with CPL**

We will use our best endeavours to guarantee that all Personal Data that you have submitted to us is maintained and up to date. However, it is your responsibility to inform us of any changes to your Personal Data to ensure that it is up to date.

Where we currently hold personal information about you, you may at any time request that we modify, update, erase or provide a copy of this information to you. We will also provide an annual reminder for you to update this data or request your data to be removed. All such deletions and date updates should be sent to [dataprivacy@cpl.com](mailto:dataprivacy@cpl.com) from the email address of record and these will be actioned within one week and you will receive confirmation that this has been completed. We may only refuse your request where we are legally obliged to do so. Where your request has

been refused we will provide you with reasons for this refusal. We will then hold such data for only as long as it is necessarily required by law.

### **Security of your Personal Information**

We are committed to the protection of Personal Information submitted to us. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. We use a variety of security technologies and procedures to help protect your personal information from unauthorised access, use, or disclosure. While the Cpl Group takes all due care in ensuring the privacy and integrity of the information that you provide, we recognise that no data transmission over the Internet can be guaranteed to be 100% secure. The possibility exists that this information could be unlawfully observed by a third party while in transit over the Internet. Cpl Group Limited accepts no liability should this occur.

### **Cookies**

Cookies is a text file that is stored on your computer's hard drive relating to your viewing history of a website. If you return to that website, it can present tailored selections to you created upon the stored information about your last visit. You can normally adjust the settings of your browser to avoid the acceptance of cookies. Cookies will not harm your system.

We use site tracking software to monitor traffic patterns and site usage to help us develop the design and layout of the websites.

**Security:** These cookies allow us to securely access to your account

**Preference:** These cookies are used to store your preferences like language choice and display of job search results

**Analytics:** In order to monitor how our sites are performing, we collect data about page visits. This information is completely anonymous — we cannot determine who it came from. When we use this data, we look at numbers of visitors overall rather than individual visits.

Analytics information is used in reports and to improve our site. For example, we have used analytics

data to add, remove or change features of the site based on how popular they are with users. We track, for example

- Page views
- Popular times
- Length of visit
- Where visitors came from
- Technical data about devices or browsers used to access the site

We use Google to provide our analytics data. You can read more about how Google Analytics treats your data at: [Google: Safeguarding your data](#). You can also read [Google's full privacy policy](#).

**Site features:** We track which jobs you look at so we can show you similar roles.

**Session:** As you move through the site, various pieces of information need to be stored in order for the site to function properly. For example, if you perform a search for jobs, the search terms you use will be remembered so that you can change them later. If you log in, we will remember which account you logged in with.

**Advertising:** We use data collected via cookies to help us to understand our advertising audience and design online advertising campaigns that reach only the people most likely to be interested. That includes using advertising to reach users who have taken, or not taken, a specific action on one of our websites.

Our websites are connected to a number of third-party services that can track usage of our site. We facilitate this connection in order to access better analytics data and design advertising campaigns that only reach interested users. This data is only ever shared anonymously, we do not share personal information with any third party via cookies. This data is shared with the following third party companies:

- Google
- Marketo
- Facebook
- LinkedIn
- Twitter

**[Changes to this Privacy Policy](#)**

Where a change is made to this Privacy Policy it will be set out on our websites to ensure that you are aware of what information we collect and how we will use it. If we plan to use Personal Data in a way that is inconsistent from that stated in this Privacy Policy, we will inform in advance you by email, and it will be your decision as to whether or not you are happy that we continue store and process your information.

This privacy policy is effective from 17/05/18.