

WILLKOMMEN BEI DATA PROTECTION GERMANY



HAYS GENERAL PRIVACY POLICY

INTRODUCTION

- This Privacy Policy 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.
- This Privacy Policy applies in respect of the personal data of the following categories of people: [Candidates](#), [Temporary Workers](#), [Clients](#), [Suppliers and Third Parties](#), [People Whose Data We Receive](#), [Website Users](#), [Staff Alumni](#), and [Visitors](#).
- If you are:
 - a member of Hays' Staff, you should refer to the Hays' Staff Privacy Policy which is available on the Hays Intranet; or
 - seeking employment with Hays internally, you should refer to the [Recruits Privacy Policy](#).
- We are subject to applicable data protection legislation including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the “**GDPR**”), and the UK GDPR. Please note that when we refer to the GDPR throughout this Privacy Policy, we are referring to both the GDPR and UK GDPR.
- The company responsible for your personal data (“**Hays**”, “**we**” or “**us**”) can be found [here](#).
- It is important to point out that we may amend this Privacy Policy from time to time. Please just visit this page if you want to stay up to date, as we will post any changes here.
- If you are dissatisfied with any aspect of our Privacy Policy, you may have legal rights and, where relevant, we have described these in this document.

HOW TO USE THIS PRIVACY POLICY

- This Privacy Policy tells you a few things about how we use your personal data, and perhaps more importantly, what your rights are in relation to this (you have, for example, the right to ask us to delete or confirm the nature of information that we hold about you at any time, withdraw any consents that you may previously have given and/or lodge a complaint with our Data Protection Officer or a supervisory authority if you are not happy about something we have done).
- The Privacy Policy is broadly divided into two sections:
 - Context-specific privacy information that applies to the different categories of person covered by this Privacy Policy, as follows:
 - [Candidates](#)
 - [Temporary Workers](#)
 - [Clients](#)
 - [Suppliers and Third Parties](#)
 - [People Whose Data We Receive](#)
 - [Website Users](#)
 - [Staff Alumni](#)
 - [Visitors](#)

- General privacy information that applies to all of the different categories of people covered by this Privacy Policy, including:
 - [Who do we share your personal data with?](#)
 - [How do we safeguard your personal data?](#)
 - [How long do we keep your personal data for?](#)
 - [How can you access, amend or take back the personal data that you have given to us?](#)
 - [Who is responsible for processing your personal data when you access the Hays website?](#)
 - [How do we store and transfer data internationally?](#)
 - [Cookies Policy](#)
 - [Use of third party services](#)
- This Privacy Policy applies in relevant countries throughout our international network. Different countries may approach data privacy in slightly different ways and so we also have country-specific parts to this Privacy Policy. You can find country-specific provisions for your jurisdiction [here](#). This allows us to ensure that we're complying with all applicable data privacy protections, no matter where you are.
- This Privacy Policy also contains a number of defined terms (which we distinguish by starting them with a capital letter), so we have included a [Glossary](#) at the end of this document.

CONTEXT-SPECIFIC PRIVACY INFORMATION

1. CANDIDATES

This section of the Privacy Policy applies to Candidates.

Candidates include individuals with whom Hays has not had prior contact, but whom Hays reasonably considers would be interested in, or might benefit from, Hays' services and being considered for any roles advertised or promoted by Hays including permanent, part-time and temporary positions and freelance roles with Hays' Clients (including those individuals who want to become Temporary Workers). Candidates also include applicants for such roles as well as people who have supplied a speculative CV to Hays not in relation to a specific job and/or who have engaged with Hays about Hays' services and/or any roles advertised or promoted by Hays. Individual contractors, freelance workers and employees of suppliers or other third parties put forward for roles with Hays' Clients as part of an MSP offering or otherwise will be treated as Candidates for the purposes of this Privacy Policy.

WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT?

So you're looking for a bit more insight into what data we collect about you? Here's a more detailed look at the sorts of information that we will collect. The information described below is, of course, in addition to any personal data we are required by law to process in any given situation.

Depending on the relevant circumstances and applicable local laws and requirements, we will collect some or all of the information listed below to enable us to assess how we can assist you if we reasonably believe you might be interested in, or might benefit from our services, and to offer you employment opportunities which are 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 only process the data in those jurisdictions to the extent and under the circumstances permitted by law:

- **Key identification and contact information**
 - Name;
 - Age/date of birth;
 - Birth number;
 - Sex/gender;
 - Photograph;
 - Marital status;
 - Nationality/citizenship/place of birth;
 - Contact details;
 - Emergency contacts/next of kin information and details of any dependants;
 - A copy of your driving licence and/or passport/identity card;
- **Education and employment information**
 - Education details;
 - Employment history;
 - Current job title/specialism/industry sector;
 - Skills and languages spoken;
 - Referee details;
 - Immigration status (whether you need a work permit);
 - Start date or availability date;

- Details about your previous and current remuneration, pensions and benefits arrangements;
- Details of hours worked (once you have been placed in a role);
- 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 or from links clicked on in emails from us;
- **Financial information**
 - Bank details;
 - 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;
- **Special category information**
 - Details of racial or ethnic origin, sexual orientation, religious or other similar beliefs, and physical or mental health, including disability-related information, in ease case for diversity monitoring purposes;
 - Sexual orientation (for example where you disclose this through providing next-of-kin details);
 - Physical or mental health, including disability-related information in order to enable us to make reasonable adjustments and health-related information when we need to use or offer occupational health to you in the context of certain types of roles;
 - Details of health-related information arising from or in connection with the COVID-19 or other pandemics, if this is required for a role that you are interested in applying for or where volunteered by you, e.g. a test result (whether positive or negative) or vaccination history (including medical conditions relating to or affecting vaccination) where appropriate;
 - In certain circumstances, video recordings of Candidates attending or participating in training or meetings where individuals have consented to the recording;
 - Religious Beliefs in order to calculate entitlement to annual leave;
- **Criminal conviction data**
 - Details of any criminal convictions if this is required for a role that you are interested in applying for;
- **Automatically collected information**
 - IP address;
 - Usage information including the dates, times and frequency with which you access our services;
 - User choices (e.g. marketing preferences);
 - User reports;
 - Log and troubleshooting information;
 - Device information when you install, access or use our services;
 - Website browsing data e.g. pages viewed e.g. Hays or Clients' websites;
 - Email engagement history with Hays;
 - Location information (inferred from jobs, IP address, application history or system stored data);
 - Account access information (e.g. PIN numbers for account verification purposes);
- **Information that others provide about you**

- 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 (which you have uploaded information onto, or is otherwise made available to us);
- Information about your interests and needs regarding future employment, both collected directly and inferred, for example from jobs viewed or articles read on our website or from links clicked on in emails from us; and
- **Additional information that you choose to tell us**
 - Any other information that you may provide to us including, for instance, details of your childcare or carer arrangements (for example, when you authorise a deduction from pay for childcare vouchers or when you volunteer this information) and when corresponding with us via email or otherwise.

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

To the extent that you access our website or click through any links in an email from us, we will also collect certain data from you. If you would like more information about this, please refer to the context-specific section of this Privacy Policy that applies to Website Users.

HOW DO WE COLLECT YOUR PERSONAL DATA?

We collect Candidate personal data in the following ways:

- Personal data that you, the Candidate, give to us;
- Personal data that we receive from other sources; and
- Personal data that we collect automatically.

Personal data you give to us

- Hays needs to know certain information about you in order to provide you with its services. This will enable us, amongst other things, 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. These may include:
 - Entering your details on the Hays website or via an application form, as part of the registration process;
 - Leaving a hard copy CV at a Hays recruitment event, job fair or office;
 - Emailing your CV or other information to a Hays consultant or being interviewed by them;
 - Applying for jobs through a job aggregator, which then redirects you to the Hays website;
 - Entering your personal details into a Hays microsite; or
 - Entering a competition through a social media channel such as Facebook or Twitter (or similar).
- The types of information that receive from you in this way include:
 - Key identification and contact information;
 - Education and employment information;
 - Financial information;
 - Special category information;

- Criminal conviction data, and
- Additional information that you choose to tell us,

as described in the section entitled “What Kind of Personal Information Do We Collect?” above.

Personal data we receive from other sources

- We also receive personal data about Candidates from other sources. Depending on the relevant circumstances and applicable local laws and requirements, this will involve personal data received in the following situations:
 - When we search for Candidates via third party sources, such as LinkedIn and other job sites, from which we obtain your personal information and/or when we carry out other pre-recruitment activities (please refer to the section entitled “Pre-recruitment activities” below);
 - Your referees may disclose personal information about you;
 - Our Clients, Suppliers, other Candidates and our colleagues within Hays (e.g. in the context of them making a referral) may share personal information about you with us;
 - If we receive your personal information from Facebook or Twitter, if you ‘like’ our Facebook page or ‘follow’ us on Twitter (or perform a similar interaction with us on any social media platform on which we have a presence); and
 - If you were referred to us through an RPO or an MSP supplier, they may share personal information about you with us.
- The types of information that we receive about you in this way include the information that others provide about you described in the section entitled “What Kind of Personal Information Do We Collect?” above.

Personal data we collect automatically

- To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we will also collect your data automatically (e.g. via website tracking scripts such as cookies or pixels) or through you providing it to us. For more information, please refer to the context-specific section of this Privacy Policy that applies to Website Users.
- The types of information that we collect about you in this way includes the “Automatically collected information” described in the section entitled “What Kind of Personal Information Do We Collect?” above.

HOW DO WE USE YOUR PERSONAL DATA?

We generally use Candidate data in five ways:

- Pre-recruitment Activities;
- Recruitment Activities;
- Marketing Activities;
- Equal Opportunities Monitoring; and
- To help us to establish, exercise or defend legal claims.
- In appropriate circumstances, we also use Candidate data for Profiling.

Pre-recruitment Activities

- When conducting pre-recruitment activities, we use your data to work out whether you might be interested in, or might benefit from, our services, and to assess whether and how we might be able to assist you. If we think we can help, we will use your contact details to get in touch with you and find out if you are interested in our services (usually via email), subject to any applicable laws and requirements.
- In order for us to do this, we may:
 - Collect your personal data;
 - Store your details (and update them when necessary) on our database so that we can contact you about our services;
 - Send you an email to inform you about our processing of your personal data and to direct you towards this Privacy Policy;
 - Review your information to work out whether and how our services might help you; and
 - Contact you about our services.
- We've set out in more detail below various ways in which we will use and process your personal data for the purposes of determining whether our services would be beneficial to you, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive.
- In most cases, we will use your personal data for the purposes below if we deem it necessary to do so for our legitimate interests. Article 6(1)(f) of the GDPR 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 activities in relation to which we rely on the legitimate interests condition prejudice Candidates in any way. 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 refer to the section entitled "How can you access, amend or take back the personal data that you have given to us" in the [General Privacy Information](#) section of this Privacy Policy.
- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information in relation to your jurisdiction, please click [here](#).

| Why and how we process your information | Types of personal data used | Legal basis relied upon |
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| Collecting and processing data in the course of and to the extent necessary to work out whether you might be interested in or benefit from recruitment services, including by: <ul style="list-style-type: none"> • collecting data from Candidates and other sources, such as LinkedIn | <ul style="list-style-type: none"> • Key identification and contact information • Education and employment information • Additional information that you choose to tell us | Legitimate interests, namely it is in our interests and your interests for us to assess whether you may be interested in or benefit from our recruitment services |

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| <ul style="list-style-type: none"> storing Candidates' details on databases assessing data against vacancies | <ul style="list-style-type: none"> Information that others provide about you Automatically collected information | |
| Collecting and processing your data in the course of reviewing your information to ascertain how Hays' recruitment services may assist | <ul style="list-style-type: none"> Key identification and contact information Additional information that you choose to tell us | Legitimate interests, namely it is in our interests and your interests for us to identify how we can help you with your job search |
| Collecting and processing your data in the course of communicating with you in relation to Hays' recruitment services | <ul style="list-style-type: none"> Key identification and contact information Additional information that you choose to tell us | Legitimate interests, namely it is in our interests and your interests to contact and correspond with you as part of providing you with our recruitment services |

Recruitment Activities

- Obviously, our main area of work is recruitment – connecting the right Candidates with the right jobs. We've listed below various ways in which we will use and process your personal data for this purpose, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive.
- In most cases, we will use your personal data for the purposes below if we deem it necessary to do so for our legitimate interests. Article 6(1)(f) of the GDPR 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 activities in relation to which we rely on the legitimate interests condition prejudice Candidates in any way – in fact, they help us to offer you a more tailored, efficient service. 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 refer to the section entitled “How can you access, amend or take back the personal data that you have given to us” in the [General Privacy Information](#) section of this Privacy Policy.
- We may in certain circumstances process your personal data for the purposes below if it is necessary for us to deliver a contractual service to you (or to fulfil a pre-contract request from you). Article 6(1)(b) of the GDPR says that we can process your data where it “is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.”
- When we process your information for recruitment activities based on your consent, you have the right to withdraw your consent at any time without affecting the lawfulness of processing based on such consent before the consent is withdrawn by referring to the section entitled “How can you access, amend or take back the personal data that you have given to us” in the [General Privacy Information](#) section of this Privacy Policy.

- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information in relation to your jurisdiction, please click [here](#).

| Why and how we process your information | Types of personal data used | Legal basis relied upon |
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| <p>Collecting and processing data in the course of and to the extent necessary to provide recruitment services to Candidates and facilitating the recruitment process including by:</p> <ul style="list-style-type: none"> • Collecting data from Candidates and other sources, such as LinkedIn • Storing Candidates' details on database • Assessing data against vacancies • Sending Candidates' information to Clients, in order to apply for jobs or to assess eligibility for jobs • Enabling Candidates to submit CVs, apply online for jobs or to subscribe to alerts about jobs • Recording Candidates' question and answer sessions and/or video interviews to support our recruitment services (with the recordings being analysed for training/monitoring purposes and/or shared with Clients and viewed via a secure third party platform) • Making video recordings of | <ul style="list-style-type: none"> • Key identification and contact information • Education and employment information • Additional information that you choose to tell us (e.g. information that you tell us in a recording) • Information that others provide about you • Video recording footage | <p>We will rely on legitimate interests, namely it is in our interests and your interests for us to provide you with our recruitment services and for you to receive them in order for us to function as a profit-making business, and to help you and other Candidates to find employment</p> <p>If you have entered or are about to enter into a contract with us or if you are making a request in the course of doing so, we may rely on the performance of a contract legal basis to the extent that the processing activity that we are seeking to conduct is necessary for the purposes of the contract or your request</p> <p>To the extent that we record a video of you, we will ask for your consent before we start recording but will rely on legitimate interests in relation to our use of the data for training/monitoring and for monitoring compliance standards</p> |

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| <p>Candidates' participation in training sessions or meetings for internal training/monitoring purposes and/or monitoring internal compliance standards</p> | | |
| <p>Processing Candidates' data to facilitate payroll and invoicing processes</p> | <ul style="list-style-type: none"> • Key identification and contact information • Education and employment information • Financial information | <p>Legitimate interests, namely it is in our interests and your interests to:</p> <ul style="list-style-type: none"> • ensure that our business runs smoothly, so that we can carry on providing services to Candidates like you • ensure that you are appropriately remunerated <p>If you have entered or are about to enter into a contract with us or if you are making a request in the course of doing so, we may rely on the performance of a contract legal basis</p> |
| <p>Collecting and processing Candidates' data in the course of carrying out:</p> <ul style="list-style-type: none"> • customer satisfaction surveys • Hays market research which we will use to inform our marketing materials and other informational materials such as whitepapers, reports and articles (e.g. our salary guides) <p>To the extent that any data is published, this will be in aggregated/anonymised form only</p> | <ul style="list-style-type: none"> • Key identification and contact information • Additional information that you choose to tell us | <p>Legitimate interests, namely it is in our interests to:</p> <ul style="list-style-type: none"> • improve and develop the recruitment services that we provide to you by considering your feedback and feeding this into our processes where we deem necessary • gain an insight into the careers, goals and aspirations of the Candidates to whom we provide services in order to market our service offering to help differentiate us in a |

| | | competitive marketplace |
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| <p>Collecting and processing Candidates' data in the course of communicating with Candidates in relation to services-related issues and providing customer support by processing requests for support</p> | <ul style="list-style-type: none"> • Key identification and contact information • Additional information that you choose to tell us | <p>We will rely on legitimate interests, namely it is in our interests and your interests to:</p> <ul style="list-style-type: none"> • address any issues that you have been experiencing • improve and develop the recruitment services that we provide to you by considering your feedback and feeding this into our processes where we deem necessary <p>If you have entered or are about to enter into a contract with us or if you are making a request in the course of doing so, we may rely on the performance of a contract legal basis in relation to using your data in the course conducting communications relating to our services with you</p> |
| <p>Processing Candidates' data to enable them to receive services ancillary to recruitment services, such as participation in:</p> <ul style="list-style-type: none"> • specialist online training • interactive features of services • recruitment-related services via the Hays App | <ul style="list-style-type: none"> • Key identification and contact information • Additional information that you choose to tell us • Information that others provide about you • Certain automatically collected information e.g. User choices and information about your use of these services | <p>We will rely on legitimate interests, namely it is in our interests and your interests to:</p> <ul style="list-style-type: none"> • recommend and grant you with access to our specialist online training or some of our more interactive services as this might help with your job search • provide you with the best possible end-to-end service and enhance our service offering to you and to help differentiate us in a |

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| | | <p>competitive marketplace</p> <p>If you have signed up to receive these ancillary services (either separately or because they form part of the recruitment services to which you have already signed up) or if you are making a request in the course of doing so, we may rely on the performance of a contract legal basis to the extent that the processing activity that we are seeking to conduct is necessary for the purposes of the contract or your request</p> |
| <p>Processing Candidates' data in the course of carrying out Hays' obligations arising from any contracts entered into between Hays and third parties in relation to Candidates' recruitment, such as potential employers to whom we are committed to identifying the most suitable Candidates for roles in their organisations</p> | <ul style="list-style-type: none"> • Key identification and contact information • Education and employment information • Financial information • Information that others provide about you • Additional information that you choose to tell us | <p>We will rely on legitimate interests, namely it is in our interests and your interests to fulfil our obligations under agreements with third parties such as potential employers so that we can help you find employment</p> <p>If you have entered or are about to enter into a contract with us or if you are making a request in the course of doing so, we may rely on the performance of a contract legal basis to the extent that the processing activity that we are seeking to conduct is also necessary for the purposes of our contract with you (as well of the third party)</p> |
| <p>Verifying details that a Candidate has provided or to request information (such as references, qualifications and potentially any criminal convictions, to the extent that this is appropriate and in accordance with local laws)</p> | <ul style="list-style-type: none"> • Key identification and contact information • Education and employment information • Criminal conviction data • Information that others provide about you • Additional information that | <p>For criminal conviction data, we will obtain your explicit consent.</p> <p>For all other types of data:</p> <ul style="list-style-type: none"> • we will rely on the legitimate interests legal basis, namely it is in our interests and your interests to verify that all of the information that you have provided to us is true and accurate and to |

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| | <p>you choose to tell us</p> | <p>obtain references about your prior conduct as part of the process of finding you employment</p> <ul style="list-style-type: none"> • if you have entered or are about to enter into a contract with us or if you are making a request in the course of doing so, we may rely on the performance of a contract legal basis to the extent that verifying details that you have provided or the requests that we need to make are necessary for the purposes of our contract with you. |
| <p>In certain jurisdictions, using a web-based video identity verification process to verify a Candidate's identity if we do not meet them in person and document this process</p> | <ul style="list-style-type: none"> • Key identification and contact information (including a copy of driving licence and/or passport/identity card) • Additional information that you choose to tell us • Video recording footage | <p>To the extent that this is carried out in your jurisdiction, we will ask for your consent before we start recording but rely on the legitimate interests condition (it is in our legitimate interests to maintain internal compliance standards) in relation to our use of the data that we capture to verify your identity.</p> <p>For more information in relation to your jurisdiction, please click here</p> |
| <p>Collecting and processing Candidate data in the course of carrying out assessment and development activities such as psychometric evaluations or skills tests - for more information in relation to your jurisdiction, please click here</p> | <ul style="list-style-type: none"> • Key identification and contact information • Additional information that you provide or choose to tell us during the evaluation/skills test (including in relation to your performance) | <p>Legitimate interests, namely it is in our interests and your interests for us to provide you with the services of our Assessment and Development departments, namely in relation to psychological assessment and research, assessment centres, competency management, reorganisation issues, management development, career development,</p> |

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| | | mobility, outplacement, career transition and coaching. |
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Marketing Activities

- We will 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 will 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.
- We need your explicit opt-in consent for some aspects of these activities 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 regarding consenting to receive marketing materials. For more information in relation to your jurisdiction, please click [here](#).
- Soft opt-in consent is a specific type of consent which applies where we have obtained your contact details from an occasion when you previously engaged with us (for example by informing one of our consultants that you are interested in our services, submitting a job application or CV, or registering a vacancy to be filled), and we are e-marketing or sending by text message other recruitment-related services of our own. Under 'soft opt-in' consent, we will take your consent as given unless or until you object or opt out (and we will remind you of your right to do this and provide you with the opportunity to opt-out, in each e-marketing message that we send to you). 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. We will use your personal data to send you e-marketing materials with your 'soft opt-in' consent if we deem that it is in our legitimate interests to do so.
- 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 opt out or withdraw your consent at any time and can find out more about how to do so by referring to the section entitled "How can you access, amend or take back the personal data that you have given to us" in the [General Privacy Information](#) section of this Privacy Policy. Nobody's perfect, even though we try to be. 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.
- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information in relation to your jurisdiction, please click [here](#).

| Why and how we process your information | Types of personal data used | Legal basis relied upon |
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| <p>Using Candidates' data to carry out marketing activities to promote our services through digital channels including in relation to:</p> <ul style="list-style-type: none"> • marketing our full range of recruitment | <ul style="list-style-type: none"> • Key identification and contact information • Automatically collected information | <p>If we have obtained your contact details from an occasion when you previously engaged with us and we are e-marketing other recruitment-related services of our own, we will rely on soft opt-in consent if we consider that the legitimate interests legal</p> |

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| <p>services (permanent, temporary, contract, outplacement, MSP programmes and RPO services) to you</p> <ul style="list-style-type: none"> • sending Candidates details of reports, promotions, offers, networking and client events, and general information about the industry sectors which we think might be of interest to them • providing Candidates with information about certain discounts and offers that they are eligible for by virtue of their relationship with Hays | | <p>basis applies, namely if we wish to reach out to you to tell you about our services and we consider that it would be in your interests to hear about similar services to those that you have already expressed an interest in</p> <p>In all other circumstances, we will obtain your opt-in consent</p> |
| <p>Collection of data via cookies or tracking pixels and use of data to show users Hays adverts and other content on other websites, for example, Facebook</p> | <ul style="list-style-type: none"> • Key identification and contact information • Automatically collected information | <p>We will obtain your consent via the Cookie Preferences link on our website</p> <p>If you do not want us to use your data in this way, please turn off the “Advertising Cookies” option (please refer to our Cookies Policy)</p> <p>Even where you have turned off advertising cookies, it is still possible that you may see a Hays advert, but in this case it won’t have been targeted at you personally, but rather at an anonymous audience</p> <p>Please note that if you access Hays’ services across multiple devices, you may need to adjust your settings (e.g. if you want to turn off advertising cookies) via the Cookie Preferences link on each of your devices</p> |

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| <p>Lookalike targeting and other data driven marketing: providing lists of certain Candidates' data to Facebook and Google to enable them to find an audience of people with similar characteristics or demographics to these Candidates (which will not include these Candidates) for Hays' marketing purposes.</p> <p>Facebook's policy is to irreversibly hash such lists prior to use, match the hashed data against their own customers, generate the lookalike audience, then delete the original list and use it for no other purpose. We will not have access to the identity of anyone in the lookalike audience, unless they choose to click on the advertisements.</p> | <ul style="list-style-type: none"> • Key identification and contact information • Automatically collected information (advertising identifiers) | <p>We will obtain your opt-in consent for the collection of advertising identifiers via the Cookie Preferences link on our website</p> <p>We will share these advertising identifiers with Facebook and Google in reliance on the legitimate interests legal basis, namely it is in our interests to identify and target advertisements to potential customers who share characteristics or demographics with our existing customers, unless we are required by local law to obtain your consent in which case we will obtain such consent via our consent management tool</p> |
| <p>Displaying excerpts from Candidates' profiles for promotional purposes on Hays' website(s) to provide examples of success stories</p> | <ul style="list-style-type: none"> • Key identification and contact information • Education and employment information • Additional information that choose to tell us (we may ask you for additional details for the purposes of the story that we tell about you) | <p>We will always ask for your explicit consent before featuring you in this way on the website</p> |
| <p>Use of Candidates' data in the course of making service and marketing communications via WhatsApp</p> | <ul style="list-style-type: none"> • Key identification and contact information • Automatically collected information | <p>We will ensure that you have opted-in (and therefore provided your consent) through one of a number of channels:</p> <ul style="list-style-type: none"> • when you signing up to WhatsApp job alerts on the website |

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| | | <ul style="list-style-type: none"> • submitting an opt-in message direct to one of our WhatsApp channels • clicking through on a sign-up button on an invite email. |
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Special category data

- We are committed to ensuring that our recruitment processes are aligned with our approach to equal opportunities and so we will process certain sensitive/special category data about you to facilitate this. Where appropriate and in accordance with local laws and requirements, we will use this information on an anonymised basis to monitor our compliance with our equal opportunities policy.
- We will collect other sensitive/special category personal data about you such as health-related information or religious affiliation if this is appropriate in accordance with local laws: 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 may also collect details of any criminal convictions if appropriate in accordance with local laws which may require your consent. If you are not happy about this, you have the right to withdraw your consent at any time and you can find out how to do so by referring to the section entitled “How you can access, amend or take back the personal data you have given us” in the [General Privacy Information](#) section of this Privacy Policy.
- Please note that in certain of the jurisdictions in which we operate, different rules apply to this sensitive/special category data. For more information in relation to your jurisdiction, please click [here](#).

| Why and how we process your information | Types of personal data used | Legal basis relied upon |
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| Collecting and analysing Candidates' data in order to assess and ensure our compliance with equal opportunities obligations | Details of racial or ethnic origin, sexual orientation, religious or other similar beliefs, and physical or mental health, including disability-related information | <p>We will process your personal data in this way if our processing is necessary for the purposes of (and we have a legitimate interest in) keeping under review the existence or absence of equality of opportunity or treatment between groups of people and local laws allow us to process your data in this way without obtaining your consent</p> <p>If local law requires us to obtain your consent, we will do so</p> |

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| <p>Sharing Candidates' data (that has been collected to assess and ensure our compliance with equal opportunities obligations) with Clients (including to their internal or external auditors) where this is contractually required or the Client specifically requests such information to enable them to comply with their own employment processes</p> | <p>Details of racial or ethnic origin, sexual orientation, religious or other similar beliefs, and physical or mental health, including disability-related information</p> | <p>We will obtain your explicit consent before we share your data in this way</p> |
| <p>Processing medical history/health-related data to make reasonable adjustments during the recruitment process</p> | <p>Medical history/physical or mental health-related data</p> | <p>We will process your personal data in this way if we have a legitimate interest in and it is necessary for us to process your data for health and social care purposes (e.g. to assess the working capacity of an employee or potential employee for an employer) and local laws allow us to process your data in this way without obtaining your consent</p> <p>If local law requires us to obtain your consent, we will do so</p> |
| <p>Processing health-related data to when we need to use or offer occupational health to Candidates in the context of certain types of roles (e.g. teaching, nursing or night work)</p> | <p>Medical history/physical or mental health-related data</p> | <p>We will process your personal data in this way if we have a legitimate interest in and it is necessary for us to process your data for health and social care purposes (e.g. the provision of health care or treatment) and local laws allow us to process your data in this way without obtaining your consent</p> <p>If local law requires us to obtain your consent, we will do so</p> |
| <p>Processing health-related information arising from or in connection with the COVID-19 or other pandemics where this is required for a role that you are interested in applying</p> | <p>Test results (whether positive or negative), or vaccination history (including medical conditions relating to or affecting vaccination) where appropriate</p> | <p>We rely on legitimate interests, namely it is in our and your interests for us to collect and share your health-related information if this is required for a role</p> |

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| <p>for or where volunteered by you</p> | | <p>that you are interested in applying for</p> <p>We may also rely on the vital interests and the public interest lawful bases, namely to protect against serious cross-border threats to health</p> <p>We may process your health and travel-related information pursuant to Article 9(2)(i) of the GDPR to enable us to process health-related information arising from or in connection with the COVID-19 pandemic to prevent the spread of and assess the risk of COVID-19 and other infectious viruses and diseases</p> <p>If local law requires us to obtain your consent, we will do so</p> |
| <p>Processing criminal convictions data when carrying out background checks</p> | <p>Details of any criminal convictions disclosed by Candidate on the Candidate Application Form</p> <p>Details of any criminal convictions obtained via background checks that we are required to carry out where this is necessary for us to comply with our legal obligations in connection with a Candidate's search for work (e.g. if we put a Candidate forward for certain roles which require a certain type of background check to be carried out)</p> | <p>We will obtain your explicit consent in the Candidate Application Form though where local laws allow us to do so, we may need to request a Disclosure and Barring Service Check (or equivalent applicable check in your jurisdiction) without your consent where this is necessary for us to comply with our legal obligations in connection with your search for work</p> |
| <p>Processing certain types of Candidate data in order to calculate entitlement to annual leave</p> | <p>Medical history/health-related data</p> <p>Religious affiliation</p> | <p>We will process your personal data in this way if our processing is necessary for the purposes of (and we have a legitimate interest in) carrying out the obligations and exercising Hays' specific rights in the field of employment and social security and social</p> |

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| | | <p>protection law and local laws allow us to process your data in this way without obtaining your consent</p> <p>If local law requires us to obtain your consent, we will do so</p> |
| <p>Processing the sensitive/special category personal data of individuals connected with Candidates, for example:</p> <ul style="list-style-type: none"> • where a Candidate discloses this to us in the course of providing next-of-kin details • to allow the relevant Candidate to access certain benefits | <p>Details of sexual orientation, and physical or mental health, including disability-related information</p> | <p>We will process your personal data in this way if our processing is necessary for the purposes of (and we have a legitimate interest in) carrying out the obligations and exercising Hays' specific rights in the field of employment and social security and social protection law and local laws allow us to process your data in this way without obtaining your consent</p> <p>If local law requires us to obtain your consent, we will do so</p> |

To help us to establish, exercise or defend legal claims

- Sometimes it will be necessary for us to process personal data in reliance on the legitimate interests legal basis and, where appropriate and in accordance with local laws and requirements, special category 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 will 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.
- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information in relation to your jurisdiction, please click [here](#).

| Why and how we process your information | Types of personal data used | Legal basis relied upon |
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| <p>Preserving, sharing and otherwise processing Candidate data to establish, exercise or defend legal claims</p> | <p>The actual information used depends on the factual circumstances, but could include any of the following:</p> | <p>Legitimate interests, namely it is in our interests to seek and receive legal advice should we need it and to protect ourselves in</p> |

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| | <ul style="list-style-type: none"> • Key identification and contact information • Education and employment information • Special category information • Criminal conviction data • Financial information • Automatically collected information • Information that others provide about you • Additional information that you choose to tell us | <p>the context of litigation and other disputes</p> <p>In the unlikely event that we need to process any special category information or criminal conviction data for this purpose, we will only do so where local law allows us to process such data to establish, exercise or defend legal claims</p> |
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Profiling, Algorithms and Automated Decision Making

- Profiling is a type of processing activity which enables us better to understand the information that we collect about you, to help us to develop a personalised “profile” for you. This helps us to gain a better idea of how you like to interact with us and our services, the sorts of requests you like to make of us and, of course, the sorts of things you don’t like. The purpose of our building this personalised profile is to enable us to provide the best possible service to you and maximise the chances that we will be able quickly and efficiently to provide you with access to content that is most likely to be relevant and helpful to you.
- We will use profiling methods in relation to your personal data if we consider this is necessary for our legitimate interests as detailed in the table 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 this by referring to the section entitled “How can you access, amend or take back the personal data that you have given to us” in the [General Privacy Information](#) section of this Privacy Policy.
- We also sometimes use automated systems such as filtering tools, or occasionally more complex tools which use an element of artificial intelligence, such as algorithms or machine learning (including those provided by third parties), to help us quickly, efficiently and more accurately to analyse data we have about you and other Candidates, as well as data we hold on our Clients' needs, and this ultimately helps us to make decisions based on this data. This can include applying tools which use algorithms (such as filtering tools or machine learning) to Candidate personal data in order to help us come up with the best possible shortlist for a particular role. Such technology should reduce significantly the amount of time needed to consider when Candidates might be the best fit for relevant jobs. This should in turn make the recruitment process much more efficient and effective, which, we hope, will improve your overall experience with us.
- As new and better technology becomes more prevalent, some of our profiling activities and our processing activities which use automated systems such as those described above,

may amount to Automated Decision Making within the meaning of Article 22 of the GDPR. This means a process of making a decision by automated means with limited, or even no, human intervention in reaching the decision. We will only use automated decision making in relation to your personal data where we consider this is necessary for the completion of pre-contractual steps taken at your request.

- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information in relation to your jurisdiction, please click [here](#).

| Why and how we process your information | Types of personal data used | Legal basis relied upon |
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| <p>Collection of data via personalisation cookies/pixels and use of this data for profiling purposes so that we can show Candidates both targeted and personalised content. This will include:</p> <ul style="list-style-type: none"> • personalising Candidates' website experience, including in relation to the roles that are brought to their attention when visiting the website • making recommendations for editorial content that we think may be of interest to Candidates (e.g. reports about developments in their industry) • personalising the marketing content that Candidates receive via the website, email and other marketing channels (where they have consented to that marketing) <p>These personalisation cookies/pixels are used to understand how Candidates engage with the website by recording their visit to the website, the</p> | <ul style="list-style-type: none"> • Key identification and contact information • Education and employment information • Automatically collected information • Additional information that you choose to tell us <p>More specifically, this will include:</p> <ul style="list-style-type: none"> • Personal information and information about the Candidate's job search (i.e. as submitted via form or pulled through from our Systems) • Details of Candidates' interactions with the website (e.g. applications, web page visits), and other information pulled through from the Systems (e.g. job title, past applications) • Location data - either inferred from jobs, IP, or application history, or system stored data | <p>We will obtain your consent via the Cookie Preferences link on our website before we place personalisation cookies/pixels on your device and enable this functionality</p> <p>If you do not wish to provide your consent to us placing a personalisation cookie on your device, please turn off the "Functionality Cookies" and "Advertising Cookies" options (please refer to our Cookies Policy)</p> <p>Please note that if you access Hays' services across multiple devices, you may need to adjust your settings via the Cookie Preferences link on each of your devices.</p> <p>Notwithstanding our collection of consent prior to placing personalisation cookies/pixels onto your device, we will rely on the legitimate interests condition in relation to the personalisation activities that we subsequently carry out</p> <p>We consider that it is in our interests (and sometimes your interests) to:</p> <ul style="list-style-type: none"> • increase engagement with and improve the experience of using our services by increasing the |

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| <p>pages they have visited, the interactions they have made and the links they have followed</p> <p>We will use this information to understand what they may be interested in and tailor what we show and send to them accordingly</p> | <ul style="list-style-type: none"> • Digital identifiers - IP address, personalisation cookies • Website browsing data, form submission data and email engagement data • Marketing preferences | <p>relevance of the content that you see across the Hays websites and email campaigns</p> <ul style="list-style-type: none"> • increase application numbers, conversion rates and application usefulness through providing tailored job recommendations to you • encourage you to come back to our website by making this most helpful experience possible • reduce website bounce rate • increase email engagement rate (i.e. the frequency with which users click through) |
| <p>We may capture and analyse Candidates' web-based behaviours using various items of data e.g. number of job ads read/applied for online, number and type of articles read, number of web visits made, membership of "talent pools"/segments – see below) in order to award a Candidate a weighted "approachability score" with a view to providing insights into Candidates' needs and to allow Hays to follow up where needed</p> <p>Consultants will use these scores as part of the shortlisting and ranking activities described in more detail below and as a factor in determining whether to approach/show roles to a Candidate, which will serve</p> | <ul style="list-style-type: none"> • Key identification and contact information • Education and employment information • Automatically collected information • Information that others provide about you • Additional information that you choose to tell us | <p>We will obtain your consent via the Cookie Preferences link on our website before we place personalisation cookies/pixels on your device</p> <p>If you do not wish to provide your consent to us placing a personalisation cookie on your device, please turn off the "Functionality Cookies" and "Advertising Cookies" options (please refer to our Cookies Policy)</p> <p>Please note that if you access Hays' services across multiple devices, you may need to adjust your settings via the Cookie Preferences link on each of your devices</p> <p>However, please note that we may still carry out</p> |

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| <p>to supplement other data that Hays holds about the Candidate</p> <p>Our collection of web-based data will rely on the personalisation cookies/pixels that we place on your device as part of the personalisation activities as described above</p> | | <p>engagement scoring activities even if a personalisation cookie is not placed on your device (e.g. we may consider the information that we already hold about you on our Systems with a view to allocating you an engagement score even if you have opted out of the personalisation cookie)</p> <p>Notwithstanding our collection of consent prior to placing personalisation cookies/pixels onto your device, we will rely on the legitimate interests condition in relation to allocating you an engagement score and our subsequent use of this score</p> <p>We consider that it is in our legitimate interests to allocate you with an engagement score in order to help our consultants to make decisions in relation to suggesting relevant roles and sending relevant communications to you</p> |
| <p>We may use the data that we collect via personalisation cookies/pixels e.g. web-based behaviours such as details of Candidates' interactions with the website (e.g. applications, web page visits), to enrich the Candidate data and existing profiles about them that we already hold on our Systems</p> | <ul style="list-style-type: none"> • Key identification and contact information • Education and employment information • Automatically collected information | <p>We will obtain your consent via the Cookie Preferences link on our website before we place personalisation cookies/pixels on your device</p> <p>If you do not wish to provide your consent to us placing a personalisation cookie on your device, please turn off the "Functionality Cookies" and "Advertising Cookies" options (please refer to our Cookies Policy)</p> <p>Please note that if you access Hays' services across multiple devices, you may need to adjust your settings via the Cookie Preferences link on each of your devices</p> |

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| | | <p>Notwithstanding our collection of consent prior to placing personalisation cookies/pixels onto your device, we will rely on the legitimate interests condition in relation to using data that we collect about you to enrich your existing profile on our Systems</p> <p>We consider that it is in our legitimate interests to enrich the data that we hold about you to help our consultants to make decisions in relation to suggesting relevant roles and sending relevant communications to you</p> |
| <p>Analysing Candidates' data by continuously tracking and monitoring their experience and account activity in order to profile them and allocate them to "talent pools" based on their attributes and behaviours (e.g. previous roles, skills, industry experience, location, when a Candidate is willing to work)</p> <p>Talent pools are used as a means of managing the Candidate database, placing Candidates in roles and marketing to Candidates</p> <p>The assignment of Candidates to talent pools is a fully automated process and can involve the use of bots</p> | <ul style="list-style-type: none"> • Key identification and contact information • Education and employment information • Automatically collected information • Information that others provide about you • Additional information that you choose to tell us | <p>Legitimate interests, namely it is in our interests to use profiling methods to place you and your Candidate profile into groups or segments with other Candidates, based on your interests, habits, attributes and/or preferences in order to:</p> <ul style="list-style-type: none"> • help us to optimise the matching of Candidate profiles to roles and improve the effectiveness and efficiency of the recruitment cycle • allow us to keep track of whether we have enough suitable Candidates to fulfil our business needs and those of our Clients at all times • help our consultants to make decisions in relation to suggesting relevant roles and sending relevant |

| | | communications to you |
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| <p>We may use profiling methods in relation to Candidates' data so that we can:</p> <ul style="list-style-type: none"> • place them and other suitable Candidates on shortlists for particular roles based on prescribed criteria, which will allow our consultants to identify the most appropriate Candidates for roles in the most efficient manner efficiently; and • recommend roles based on how a Candidate's interests, habits, attributes and/or preferences, rank in comparison to other Candidates <p>Our intention is for any such activities (which might involve using automated processes to profile, select, screen, rank, grade, shortlist and/or put forward Candidates for roles) to complement rather than completely replace the activity of our consultants</p> | <ul style="list-style-type: none"> • Key identification and contact information • Education and employment information • Automatically collected information • Information that others provide about you • Additional information that you choose to tell us | <p>Legitimate interests, namely it is in our interests to use profiling methods to place you and your Candidate profile into groups or segments with other Candidates, based on your interests, habits, attributes and/or preferences in order to:</p> <ul style="list-style-type: none"> • help us to optimise the matching of Candidate profiles to roles and improve the effectiveness and efficiency of the recruitment cycle • help our consultants to make decisions in relation to suggesting relevant roles to you <p>If these shortlisting and ranking activities amount to Automated Decision Making for the purposes of Article 22 of the GDPR, we will only conduct these activities where we deem this to be necessary for the completion of pre-contractual steps taken at your request. We think it is reasonable to assume that, as a Candidate, you are hoping to enter into an employment contract, and that by using our services you are asking us to take the necessary steps for this purpose. Such steps might include, for example, checking you meet certain requirements for a particular role. If the role is very popular, we may have to check the eligibility of a large number of potential Candidates – we may therefore use automated decision making to filter this</p> |

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| | | pool of Candidates down to a more manageable number. |
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Compliance with a legal obligation

- In some circumstances, we will use your personal data to comply with our legal obligations. Article 6(1)(c) of the GDPR says that we can process your data where it “is necessary for compliance with a legal obligation to which (we) are subject”.
- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information in relation to your jurisdiction, please click [here](#).

| Why and how we process your information | Types of personal data used | Legal basis relied upon |
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| Accessing, preserving and disclosing Candidates' data if there is a valid legal request from a regulator, law enforcement, authority or if we otherwise have a legal duty to do so | <p>The actual information used depends on the factual circumstances, but could include any of the following:</p> <ul style="list-style-type: none"> • Key identification and contact information • Financial information • Automatically collected information • Education and employment information • Information that others provide about you | <p>Compliance with a legal obligation including where:</p> <ul style="list-style-type: none"> • we are in receipt of a court order to disclose information for the purposes of court proceedings in the context of civil and commercial matters • we are compelled by law enforcement agencies to provide data in relation to a criminal investigation • we need to comply with our obligations under consumer law, for example competition legislation • we need to comply with our obligations under companies legislation and tax law, for example, to provide details of your remuneration and tax paid |

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| | | <ul style="list-style-type: none"> • we need to comply with our obligations under data protection laws • we need to comply with our obligations under employment laws (e.g. those which require us to track the number of hours you have worked) |
| Preserving and sharing Candidates' data with others including law enforcement agencies and to respond to legal requests when we are not compelled by applicable law but have a good faith belief it is required by law in the relevant jurisdiction | <p>The actual information used depends on the factual circumstances, but could include any of the following:</p> <ul style="list-style-type: none"> • Key identification and contact information • Financial information • Automatically collected information • Information that others provide about you | Even where we are not under a legal obligation to process your data, we will, under certain circumstances, have a legitimate interest in cooperating with law enforcement agencies and other bodies in order to assist, for example, with the prevention and detection of crime |
| Processing Candidates' data when verifying documents and information requested from and provided by Candidates to prove that they have the right to work in a particular jurisdiction | <ul style="list-style-type: none"> • Key identification and contact information (e.g. a copy of your passport and proof of address) • Education and employment information (e.g. immigration status and work permit if applicable) • Financial information (e.g. social security number or equivalent in your country) | We will process your data where this is necessary for us to comply with our legal obligations in relation to ensuring that you have the right to work in a particular jurisdiction |

Sharing of data

- We will share your personal data with various parties, in various ways and for various reasons. Primarily we will share your information with prospective employers to increase your chances of securing the job you want. Unless you specify otherwise, we will also share your information with any of our group companies and associated third parties such as our service providers and selected job aggregators where we feel this will help us to

provide you with the best possible service and maximise your chances of getting what you want.

- If you would like to see a full list of who we will share your personal data with, please refer to the section entitled “Who do we share your personal data with” in the [General Privacy Information](#) section of this Privacy Policy.
- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information in relation to your jurisdiction, please click [here](#).

| Why and how we process your information | Types of personal data used | Legal basis relied upon |
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| <p>Disclosing Candidates' data to the recipients listed in the section entitled “Who do we share your personal data with”, including the transfer, storage and processing of such data outside of the UK/European Economic Area for the purposes listed in the preceding tables</p> | <p>The actual information used depends on the factual circumstances, but could include any of the following:</p> <ul style="list-style-type: none"> • Key identification and contact information • Financial information • Education and employment information • Special category data • Criminal conviction data • Automatically collected information • Information that others provide about you • Additional information that you choose to tell us | <ul style="list-style-type: none"> • The disclosure is necessary (e.g. to potential employers) to conclude and perform any contracts that we have entered into with you (see section entitled Recruitment Activities above) • The disclosure (e.g. to tax, audit, or other authorities) is necessary for the compliance with a legal obligation to which we are subject (see section entitled Compliance with a legal obligation above) • The disclosure (e.g. to our professional advisers) is necessary to help us to establish, exercise or defend legal claims • We have obtained your consent (e.g. when we share your special category data with Clients (including to their internal or external auditors) where this is contractually required or the |

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| | | <p>Client specifically requests such information to enable them to comply with their own employment processes</p> <ul style="list-style-type: none"> • The disclosure is necessary for health and social care purposes (e.g. to an occupational health specialist to enable the provision of support during the recruitment process if an Candidate suffers from a health condition or disability) • The disclosure is necessary for carrying out the obligations and exercising Hays' specific rights in the field of employment and social security and social protection law (e.g. on an intragroup basis when assessing and effecting your entitlement to annual leave/certain benefits) • The disclosure is necessary for the purposes of 'legitimate interests' pursued by us (as detailed in the tables above) |
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2. TEMPORARY WORKERS

This section of the Privacy Policy applies to Temporary Workers.

Temporary Workers include someone who becomes employed or engaged by Hays for the purposes of undertaking temporary work for a Client or other Hays group company. If you are a Temporary Worker, we will also continue to process your personal data as a Candidate throughout the duration of your temporary work assignment and thereafter, in accordance with the terms of this Privacy Policy. The question of whether and the extent to which the [Recruits Privacy Policy](#) and the Staff Privacy Policy apply to you as a Temporary Worker depends on local law requirements. For more information in relation to your jurisdiction, please click [here](#). Temp Relationship means our contractual relationship with Temporary Workers while they are employed or engaged directly by us.

WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT?

If we employ or engage you as a Temporary Worker directly, we will, depending on the relevant circumstances and applicable local laws and requirements, collect some or all of the information listed below (in addition to the data collected about Candidates) in order to ensure that our Temp Relationship runs smoothly and that we are able to comply with our contractual and other duties to each other, and to our Clients, as part of our Temp Relationship and our duties to third parties such as tax authorities and government agencies. In some jurisdictions, we are restricted from processing some of the data outlined below. In such cases, we will only process the data in those jurisdictions to the extent and under the circumstances permitted by law:

- **Temporary worker information**
 - Staff number/social security number/other identifier;
 - Location of your workplace at the Client;
 - Details of any complaints, whether brought by or against you or in which you are or have been otherwise involved;
 - Details of any leave you take or request during our Temp Relationship;
 - Details of travel undertaken;
 - Details of resident/work permit;
 - Where applicable:
 - Details of any grievance or disciplinary matters, whether brought by or against you or in which you are or have been otherwise involved; and
 - Information about your performance in your role during our Temp Relationship, including details of any bonuses or promotions you receive performance assessments and other information that relates to your employment, your interaction with colleagues and employment-related issues that arise; and
- **Special category information**
 - Details of any sickness absence including health-related information.

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

A number of elements of the items listed above are required to enable us to fulfil our contractual duties to you or to others. Some, for example your social security number (or equivalent) are required by statute or other laws. Other items may simply be needed to ensure that our Temp Relationship can run smoothly, or to run our business.

Depending on the type of personal data in question and the grounds on which we may be processing it, should you decline to provide us with such data, we may not be able to fulfil our contractual requirements or, in extreme cases, may not be able to continue with our Temp Relationship.

HOW DO WE COLLECT YOUR PERSONAL DATA?

If we employ or engage you as a Temporary Worker directly, we collect your data (in addition to the data already collected about Candidates) in the following ways:

- Personal data that you give to us; and
- Personal data that we receive from other sources.

Below are some more details about each of these methods.

Personal data you give to us

Hays needs to know certain information about you in order to fulfil our obligations to you, to ensure that you are properly fulfilling your obligations to us, and to ensure that we are both fulfilling our obligations to others. This information will enable us to operate a usual Temp Relationship, along with all that entails.

There are numerous ways that you can share your information with us in addition to the information you share as a Candidate. Where appropriate and in accordance with any local laws and requirements, these may include:

- when you complete registration forms at the beginning of our Temp Relationship; or
- in meetings or communications with your consultant, our HR team or other colleagues.

The types of information that we receive from you in this way include:

- Temporary worker information; and
- Special category information,

as described in the section entitled “What Kind of Personal Information Do We Collect?” above.

Personal data we receive from other sources

We also receive personal data about you from other sources. Depending on the relevant circumstances and applicable local laws and requirements, these may include personal data received in the following situations:

- if you were referred to us through a recruitment agency or other work agencies, they may have shared personal information about you with us;
- information obtained about you from third party service providers who undertook background checks about you on our behalf at the start of our Temp Relationship;
- your colleagues may share personal information about you with us;
- medical professionals may (in appropriate and limited circumstances) share personal information about you with us;
- your pension and benefits providers may share relevant personal information about you with us; and
- other third parties like your local tax authority may share your personal data with us.

The types of information that we receive about you in this way include:

- Temporary worker information; and
- Special category information,

as described in the section entitled “What Kind of Personal Information Do We Collect?” above.

HOW DO WE USE YOUR PERSONAL DATA?

If we employ or engage you as a Temporary Worker directly, we use your data for the following purposes:

- To ensure the smooth running of our Temp Relationship, including all of the activities that need to be undertaken in a usual relationship of that type, such as:
 - facilitating payroll and invoicing processes, if relevant to your jurisdiction;
 - determining the terms on which you work during your Temp Relationship;
 - keeping a record of any promotions, salary rises or bonuses you are awarded; and
- Assessing your performance.

Some more detailed information about the way in which your data is processed can be found in the [Recruits Privacy Policy](#). For example, during the on-boarding process with Hays, Temporary Workers will be treated in a similar way as recruits for Hays roles and their personal data during the recruitment process for such roles will be processed in the ways described in the [Recruits Privacy Policy](#). Depending on the applicable local laws, we appreciate that you are not a 'Recruit' in the sense of that Policy but given that we use the data in a similar way, for the same purposes, we thought you wouldn't mind having a quick look at that policy if you were interested in a greater level of detail.

The question of whether and the extent to which the [Recruits Privacy Policy](#) and the Staff Privacy Policy apply to you as a Temporary Worker depends on local law requirements. For more information in relation to your jurisdiction, please click [here](#).

Temp Relationship Activities

- We've listed below various ways in which we will use and process your personal data in connection with our Temp Relationship, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive.
- In most cases, we will use your personal data for the purposes below if it is necessary for us to carry out our obligations under a contract that we have entered into with you or if we deem it necessary to do so for our legitimate interests.
- Article 6(1)(b) of the GDPR says that we can process your data where it "is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract."
- Article 6(1)(f) of the GDPR 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 activities in relation to which we rely on the legitimate interests condition prejudice Temporary Workers in any way – in fact, they help us to offer you a more tailored, efficient service. 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 refer to the section entitled "How can you access, amend or take back the personal data that you have given to us" in the [General Privacy Information](#) section of this Privacy Policy.
- When we process your information for recruitment activities based on your consent, you have the right to withdraw your consent at any time without affecting the lawfulness of processing based on such consent before the consent is withdrawn. You can find out more about how to do so by referring to the section entitled "How can you access, amend or take back the personal data that you have given to us" in the [General Privacy Information](#) section of this Privacy Policy.

- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information in relation to your jurisdiction, please click [here](#).

| Why and how we process your information | Types of personal data used | Legal basis relied upon |
|---|--|---|
| <p>Collecting and processing data in the course of and to the extent necessary to facilitate the Temp Relationship, including by:</p> <ul style="list-style-type: none"> • Facilitating payroll and invoicing processes • Determining the terms on which Temporary Workers work during the Temp Relationship • Storing Temporary Worker details on database (including start dates and duration of the length of assignment, hours worked during assignments, and (in some jurisdictions) records of any promotions, salary rises or bonuses awarded) • Assessing Temporary Workers' performance • Giving Temporary Workers feedback in relation to assignments • Managing absences | <ul style="list-style-type: none"> • Temporary worker information • Special category information | <p>If you have entered into a Temp Relationship with us, we will rely on the performance of a contract legal basis to the extent that the processing activity that we are seeking to conduct is necessary for the purposes of the contract that we have entered into with you</p> <p>We will otherwise rely on legitimate interests, namely it is in our interests and your interests for us to facilitate the Temp Relationship</p> <p>If we need to process your special category data (e.g. details of any sickness absence including health-related information), we will process your personal data in this way if we have a legitimate interest in and it is necessary for us to process your data for health and social care purposes and local laws allow us to process your data in this way without obtaining your consent. If local law requires us to obtain your consent, we will do so.</p> |

Sharing of data

- If we employ or engage you directly as a Temporary Worker, we may share your personal data with a number of additional parties in order to ensure the smooth running of our Temp Relationship. For example, we may share your personal data with appropriate colleagues within Hays (this may include colleagues in overseas offices), with a Client and, if appropriate, medical professionals such as your GP or an occupational health specialist (for instance, for the purpose of any work adjustment assessments if applicable).
- We will generally rely on the same legal bases referred to in the section addressing Temp Relationship Activities above depending on the context.
- If you would like to see a full list of who we will share your personal data with, please refer to the section entitled “Who do we share your personal data with” in the [General Privacy Information](#) section of this Privacy Policy.
- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information in relation to your jurisdiction, please click [here](#).

3. CLIENTS

This section of the Privacy Policy applies to Clients.

Clients include our customers, clients, and others to whom Hays provides services in the course of its business or whom Hays reasonably considers would be interested in our services. In certain circumstances, Hays provides services to individual employees who work for Client organisations, such as training courses to teaching staff who work for Clients in the education sector. Please note that in this context, Hays requires Clients to communicate the relevant parts of this Privacy Policy (namely the sections directed at Clients, Visitors and Website Users) to their employees.

WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT?

So you're looking for a bit more insight into what data we collect about you? Here's a more detailed look at the sorts of information that we will collect. The information described below is, of course, in addition to any personal data we are required by law to process in any given situation.

The data we collect about Clients is actually very limited. We generally only need to have your contact details or the details of individual contacts at your organisation to enable us to ensure that we can reach out to you about our services, ensure our relationship runs smoothly and in certain circumstances, provide services to your employees. We also hold information relating to your online engagement with Candidate profiles and other material published by Hays, which we use to ensure that our marketing communications to you are relevant and timely. We may also hold extra information that someone in your organisation has chosen to tell us. In certain circumstances, such as when you engage with our Finance and Debt Recovery teams, our calls with you may be recorded, depending on the applicable local laws and requirements. If we need any additional personal data for any reason, we will let you know:

- **Key identification and contact information**

About yourself or individual contacts at your organisation, including:

- Names;
- Job titles;
- Telephone numbers;
- Email addresses;

- **Automatically collected information**

- Information relating to your online engagement with Candidate profiles;
- Information relating to your online engagement with other material published by Hays;
- IP address;
- Extra Usage information that you choose to tell us; including the dates, times and frequency with which you access our services;
- User choices (e.g. marketing preferences);
- User reports;
- Log and troubleshooting information;
- Device information when you install, access or use our services;
- Website browsing data e.g. pages viewed (limited to Hays websites);
- Email engagement with Hays;
- Location information (inferred from jobs, IP address, application history or system stored data);
- Account access information (e.g. PIN numbers for account verification purposes);

- **Information that others provide about you**

- Extra information that our Candidates may tell us about you, or that we find from other third party sources; and
- **Additional information that you choose to tell us**
 - Extra information that you or someone in your organisation has chosen to tell us, including when corresponding with us via email or otherwise.

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

To the extent that you access our website or click through any links in an email or text message from us, we will also collect certain data from you. If you would like more information about this, please refer to the Context-Specific section of this Privacy Policy that applies to Website Users.

HOW DO WE COLLECT YOUR PERSONAL DATA?

We collect Client personal data in the following ways:

- Personal data that we receive from you;
- Personal data that we collect or receive from other sources; and
- Personal data that we collect automatically.

Personal data that we receive directly from you

- We both share the same goal – to make sure that you have the best staff for and at your organisation. We will receive data directly from you in two ways:
 - Where you contact us proactively, usually by phone or email; and/or
 - Where we contact you, either by phone or email, or through our consultants' business development activities more generally.
- The types of information that we receive from you in this way include:
 - Key identification and contact information; and
 - Additional information that you choose to tell us,
 as described in the section entitled “What Kind of Personal Information Do We Collect?” above.

Personal data we receive from other sources

- Where appropriate and in accordance with any local laws and requirements, we will seek more information about you or your colleagues from other sources generally by way of due diligence or other market intelligence:
 - From third party market research and by analysing online and offline media (which we will do ourselves or employ other organisations to do for us);
 - From reputable vendors of business-to-business data lists to the extent we are able to use such data from such sources in compliance with the GDPR;
 - 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 or where they give feedback on a particular assignment.
- The types of information that we receive about you in this way may include information that others provide about you as described in the section entitled “What Kind of Personal Information Do We Collect?” above.

Personal data we collect via our website or through links and emails

- To the extent that you access our website or read or click on an email or text message from us, where appropriate and in accordance with any local laws and requirements, we will also collect your data automatically or through you providing it to us. For more information, please refer to the Context-Specific section of this Privacy Policy that applies to Website Users.
- The types of information that we collect about you in this way include the automatically collected information as described in the section entitled “What Kind of Personal Information Do We Collect?” above.

HOW DO WE USE YOUR PERSONAL DATA?

We use Client information for:

- Providing our services;
- Marketing Activities; and
- To help us to establish, exercise or defend legal claims.

Providing our services

- Our services broadly consist of: (i) providing you with Candidates; (ii) RPO services; (iii) MSP programmes; and (iv) consultancy and advisory services. We've listed below the various ways in which we use your data in order to facilitate this.
- We also provide services to your employees such as training courses to teaching staff who work for our Clients in the education sector, which will require us to use their personal data in order to grant them access to these services.
- In most cases, we will use your personal data for the purposes below if we deem it necessary to do so for our legitimate interests.
- Article 6(1)(f) of the GDPR 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 activities in relation to which we rely on the legitimate interests condition prejudice Clients in any way. 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 refer to the section entitled “How can you access, amend or take back the personal data that you have given to us” in the [General Privacy Information](#) section of this Privacy Policy.
- Please note that in certain jurisdictions in which we operate, we comply with additional local law requirements. For more information in relation to your jurisdiction, please click [here](#).

| Why and how we process your information | Types of personal data used | Legal basis relied upon |
|--|--|---|
| Collecting and processing data in the course of and to the extent necessary to | <ul style="list-style-type: none">• Key identification and contact information | Legitimate interests, namely it is in our interests and your interests: |

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| <p>reach out to Clients about our services, including by:</p> <ul style="list-style-type: none"> • Storing Client details (and updating them when necessary) on Hays' database, so that Hays can contact Clients in relation to our services; • Keeping records of Hays' conversations and meetings with Clients, so that Hays can provide targeted services to Clients | <ul style="list-style-type: none"> • Information that others provide about you • Additional information that you choose to tell us | <ul style="list-style-type: none"> • for us to reach out to you about our services in order to provide you or your organisation with suitable Candidates, an MSP programme; RPO services and/or consultancy and advisory services |
| <p>Collecting and processing data in the course of and to the extent necessary to:</p> <ul style="list-style-type: none"> • provide services to colleagues/employees of Hays' Clients • make video recordings of Clients' (and colleagues/employees of Clients) participation in training sessions or meetings for internal training/monitoring purposes and/or maintaining internal compliance standards | <ul style="list-style-type: none"> • Key identification and contact information • Additional information that you choose to tell us • Video recording footage | <p>Legitimate interests, namely it is in our interests and your interests:</p> <ul style="list-style-type: none"> • for us to, in certain circumstances, reach out to your colleagues/employees about our services, such as training courses <p>To the extent that we record a video of you, we will ask for your consent before we start recording, but will rely on legitimate interests in relation to our use of the data for training/monitoring and for maintaining compliance standards</p> |
| <p>Collecting and processing Client data in the course of carrying out:</p> <ul style="list-style-type: none"> • customer satisfaction surveys • Hays market research which Hays will use to inform its marketing | <ul style="list-style-type: none"> • Key identification and contact information • Automatically collected information • Additional information that | <p>Legitimate interests, namely it is in our interests and your interests to:</p> <ul style="list-style-type: none"> • improve and develop the recruitment services that we provide to you by considering your feedback and |

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| <p>materials and other informational materials, such as whitepapers, reports and articles (e.g. Hays' salary guides)</p> <p>To the extent that any data is published, this will be in aggregated/anonymised form only</p> | <p>you choose to tell us</p> | <p>feeding this into our processes where we deem necessary</p> |
| <p>Processing Client data in the course of carrying out Hays' obligations arising from any contracts entered into between Hays and third parties in relation to recruitment, such as potential Candidates who Hays identifies as suitable for a role in a Client organisation</p> | <ul style="list-style-type: none"> • Key identification and contact information • Information that others provide about you • Additional information that you choose to tell us | <p>Legitimate interests, namely it is in our interests and your interests to fulfil our obligations under agreements with third parties such as potential Candidates, so that we can help you find suitable employees</p> |
| <p>In certain jurisdictions, using a web-based video identity verification process to verify a Client's identity and document this process</p> | <ul style="list-style-type: none"> • Key identification and contact information (including a copy of driving licence and/or passport/identity card) • Additional information that you choose to tell us • Video recording footage | <p>To the extent that this is carried out in your jurisdiction, we will ask for your consent before we start recording but rely on compliance with a legal obligation to the extent that we are compelled by applicable law to verify your identity (e.g. in the context of payments services)</p> <p>For more information in relation to your jurisdiction, please click here</p> |
| <p>Collecting and processing Client data in the course of obtaining Candidate references from Clients, and sharing this data with third parties who require these references where appropriate</p> | <ul style="list-style-type: none"> • Key identification and contact information • Additional information that you choose to tell us • Reference about a Candidate | <p>Legitimate interests, namely it is in our interests to obtain Candidate references in the course of carrying out our services, and to verify details they have provided</p> |

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 such as our Global Skills Index 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 and can find out more about how to do so by referring to the section entitled “How can you access, amend or take back the personal data that you have given to us” in the [General Privacy Information](#) section of this Privacy Policy.
- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding marketing activities. For more information in relation to your jurisdiction, please click [here](#).

| Why and how we process your information | Types of personal data used | Legal basis relied upon |
|--|---|--|
| Processing Client data for the purpose of targeting appropriate marketing campaigns for Hays' services | <ul style="list-style-type: none"> • Key identification and contact information • Automatically collected information | Legitimate interests, namely if we wish to reach out to you to tell you about our services, and we consider that it would be in your interests to hear about similar services to those that you have already expressed an interest in. |

Profiling, Algorithms and Automated Decision Making

- Profiling is a type of processing activity which enables us better to understand the information that we collect about you, to help us to develop a personalised “profile” for you. This helps us to gain a better idea of how you like to interact with us and our services, the sorts of requests you like to make of us and, of course, the sorts of things you don't like. The purpose of our building this personalised profile is to enable us to provide the best possible service to you and maximise the chances that we will be able quickly and efficiently to provide you with access to content that is most likely to be relevant and helpful to you.
- We will use profiling methods in relation to your personal data if we consider this is necessary for our legitimate interests as detailed in the table 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 this by referring to the section entitled “How can you access, amend or take back the personal data that you have given to us” in the [General Privacy Information](#) section of this Privacy Policy.
- As new and better technology becomes more prevalent, some of our profiling activities and our processing activities which use automated systems such as those described above, may amount to Automated Decision Making within the meaning of Article 22 of the GDPR. This means a process of making a decision by automated means with limited, or even no, human intervention in reaching the decision. We will only use automated decision making in relation to your personal data where we consider this is necessary for the completion of pre-contractual steps taken at your request.
- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information in relation to your jurisdiction, please click [here](#).

| Why and how we process your information | Types of personal data used | Legal basis relied upon |
|--|---|---|
| <p>Collection of data via personalisation cookies/pixels and use of this data for profiling purposes so that Hays can show Clients both targeted and personalised content</p> <p>This will include:</p> <ul style="list-style-type: none"> personalising Clients' website experience, including in relation to the roles that are brought to their attention when visiting the website making recommendations for editorial content that we think may be of interest to Clients (e.g. reports about developments in the relevant industry) personalising the marketing content that Clients receive via the website, email and other marketing channels (where they have consented to that marketing) <p>These personalisation cookies/pixels are used to understand how Clients engage with the website by recording their visit to the website, the pages they have visited, the interactions they have made and the links they have followed. Hays will use this information to understand what they may be interested in and tailor what it shows and sends to them accordingly</p> | <ul style="list-style-type: none"> Key identification and contact information Automatically collected information <p>More specifically, this will include:</p> <ul style="list-style-type: none"> Personal information and information about the Client's job search (i.e. as submitted via form or pulled through from our Systems) Details of Clients' interactions with the website (e.g. applications, web page visits), and other information pulled through from the Systems (e.g. job title, past applications) Location data - either inferred from jobs, IP, or application history, or system stored data Digital identifiers - IP address, personalisation cookies Website browsing data, form submission data and email engagement data Marketing preferences | <p>We will obtain your consent via the Cookie Preferences link on our website before we place personalisation cookies/pixels on your device and enable this functionality.</p> <p>If you do not wish to provide your consent to us placing a personalisation cookie on your device, please turn off the "Functionality Cookies" and "Advertising Cookies" options (please refer to our Cookies Policy)</p> <p>Please note that if you access Hays' services across multiple devices, you may need to adjust your settings via the Cookie Preferences link on each of your devices</p> <p>Notwithstanding our collection of consent prior to placing personalisation cookies/pixels onto your device, we will rely on the legitimate interests condition in relation to the personalisation activities that we subsequently carry out</p> <p>We consider that it is in our interests (and sometimes your interests) to:</p> <ul style="list-style-type: none"> increase engagement with and improve the experience of using our services by increasing the relevance of the content that you see across the Hays websites and email campaigns increase application numbers, conversion rates and application |

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| | | <p>usefulness through providing tailored job recommendations to you</p> <ul style="list-style-type: none"> • encourage you to come back to our website by making this most helpful experience possible • reduce website bounce rate • increase email engagement rate (i.e. the frequency with which users click through) |
| <p>Hays may capture and analyse Clients' web-based behaviours using various items of data e.g. number of web visits made, number of candidates searched) in order to award a Client a weighted “approachability score” with a view to providing insights into Clients' needs and to allow Hays to follow up where needed</p> <p>Consultants will use these scores as part of the shortlisting and ranking activities described in more detail below and as a factor in determining whether to approach/show roles to a Client (and what to show them), which will serve to supplement other data that Hays holds about the Client</p> <p>Hays collection of web-based data will rely on the personalisation cookies/pixels that it places on Clients' devices as part of the personalisation activities described above</p> | <ul style="list-style-type: none"> • Key identification and contact information • Automatically collected information • Information that others provide about you • Additional information that you choose to tell us | <p>We will obtain your consent via the Cookie Preferences link on our website before we place personalisation cookies/pixels on your device</p> <p>If you do not wish to provide your consent to us placing a personalisation cookie on your device, please turn off the “Functionality Cookies” and “Advertising Cookies” options (please refer to our Cookies Policy)</p> <p>Please note that if you access Hays' services across multiple devices, you may need to adjust your settings via the Cookie Preferences link on each of your devices</p> <p>However, please note that we may still carry out engagement scoring activities even if a personalisation cookie is not placed on your device (e.g. we may consider the data that we already hold on our systems about you with a view to allocating you an engagement score even if you have opted out</p> |

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| | | <p>of the personalisation cookie)</p> <p>Notwithstanding our collection of consent prior to placing personalisation cookies/pixels onto your device, we will rely on the legitimate interests condition in relation to allocating you an engagement score and our subsequent use of this score</p> <p>We consider that it is in our legitimate interests to allocate you with an engagement score in order to help our consultants to make decisions in relation to suggesting relevant services and sending relevant communications to you</p> |
| <p>Hays may use the data that it collects via personalisation cookies/pixels e.g. web-based behaviours such as details of Clients' interactions with the website (e.g. applications, web page visits), to enrich the Client data and existing profiles about them that Hays already holds on its Systems</p> | <ul style="list-style-type: none"> • Key identification and contact information • Automatically collected information | <p>We will obtain your consent via the Cookie Preferences link on our website before we place personalisation cookies/pixels on your device</p> <p>If you do not wish to provide your consent to us placing a personalisation cookie on your device, please turn off the "Functionality Cookies" and "Advertising Cookies" options (please refer to our Cookies Policy)</p> <p>Please note that if you access Hays' services across multiple devices, you may need to adjust your settings via the Cookie Preferences link on each of your devices</p> <p>Notwithstanding our collection of consent prior to placing personalisation cookies/pixels onto your device, we will rely on the legitimate interests condition in relation to using data that we collect about you to enrich your</p> |

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| | | <p>existing profile on our Systems</p> <p>We consider that it is in our legitimate interests to enrich the data that we hold about you to help our consultants to make decisions in relation to suggesting relevant services and sending relevant communications to you</p> |
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Sharing of data

- We will share your data: (i) primarily to ensure that we provide you with a suitable pool of Candidates; (ii) to provide you with an MSP programme (or assist another organisation to do so); (iii) to provide you with RPO services (or assist another organisation to do so); to (iv) provide you with consultancy and advisory services and/or (v) to provide services to your employees, such as training courses to teaching staff who work for our Clients in the education sector. Unless you specify otherwise, we will share your information with any of our group companies and associated third parties such as our service providers to help us meet these aims.
- If you would like to see a more detailed list of who we will share your personal data with, please refer to the section entitled “Who do we share your personal data with” in the [General Privacy Information](#) section of this Privacy Policy. Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information in relation to your jurisdiction, please click [here](#).

| Why and how we process your information | Types of personal data used | Legal basis relied upon |
|--|--|--|
| <p>Disclosing Clients' data to the recipients listed in the section entitled “Who do we share your personal data with”, including the transfer, storage and processing of such data outside of the UK/European Economic Area for the purposes listed in the preceding tables</p> | <p>The actual information used depends on the factual circumstances, but could include any of the following:</p> <ul style="list-style-type: none"> • Key identification and contact information • Automatically collected information • Information that others provide about you • Additional information that you choose to tell us | <ul style="list-style-type: none"> • The disclosure (e.g. to our professional advisers) is necessary to help us to establish, exercise or defend legal claims • The disclosure is necessary for the purposes of ‘legitimate interests’ pursued by us (as detailed in the tables above) |

To help us to establish, exercise or defend legal claims

- In more unusual circumstances, we will use your personal data in reliance on the legitimate interests legal basis to help us to establish, exercise or defend legal claims.

| Why and how we process your information | Types of personal data used | Legal basis relied upon |
|--|--|---|
| Preserving, sharing and otherwise processing Client data to establish, exercise or defend legal claims | <p>The actual information used depends on the factual circumstances, but could include any of the following:</p> <ul style="list-style-type: none"> • Key identification and contact information • Automatically collected information • Information that others provide about you • Additional information that you choose to tell us | Legitimate interests, namely it is in our interests to seek and receive legal advice should we need it and to protect ourselves in the context of litigation and other disputes |

4. SUPPLIERS AND OTHER THIRD PARTIES

This section of the Privacy Policy applies to Suppliers.

Suppliers include partnerships and companies (including sole traders), and atypical workers such as independent contractors and freelance workers, who provide services to Hays. In certain circumstances Hays will sub-contract the services it provides to Clients to third party suppliers who perform services on Hays' 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, Hays requires Suppliers to communicate the relevant parts of this Privacy Policy (namely the sections directed at Candidates) to their employees.

This section of the Privacy Policy also applies to other parties with which we have a business or other type of relationship (ranging from investors to charitable organisations).

WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT?

We don't collect much data about Suppliers and other third parties with which we conduct a business relationship (e.g. investors) – we simply need to make sure that our relationship runs smoothly. We'll collect the details of contacts within your organisation, such as names, telephone numbers and email addresses. In the case of Suppliers, we'll also collect bank details, so that we can pay you. We may also hold extra information that someone in your organisation has chosen to tell us. In certain circumstances, such as when a Supplier engages with our Finance and Debt Recovery teams, our calls with you may be recorded, depending on the applicable local laws and requirements:

- **Key identification and contact information**

About yourself or individual contacts at your organisation, including:

- Names;
- Job titles;
- Telephone numbers;
- Email addresses;
- Business account bank details;
- Identification number;

- **Information that others provide about you**

- Extra information that our Candidates or Clients may tell us about you, or that we find from other third party sources; and

- **Additional information that you choose to tell us**

- Extra information that you or someone in your organisation has chosen to tell us, including when corresponding with us via email or otherwise.

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

To the extent that you access our website or click through any links in an email or text message from us, we will also collect certain data from you. If you would like more information about this, please refer to the Context-Specific section of this Privacy Policy that applies to Website Users.

HOW DO WE COLLECT YOUR PERSONAL DATA?

We collect Supplier and other third party personal data in the following ways:

- Personal data that we receive from you; and
- Personal data that we collect or receive from other sources.

Personal data that we receive directly from you

- We will receive data directly from you in two ways:
 - Where you contact us proactively, usually by phone or email; and/or
 - Where we contact you, either by phone or email.
- The types of information that we receive from you in this way include:
 - Key identification and contact information; and
 - Additional information that you choose to tell us,as described in the section entitled “What Kind of Personal Information Do We Collect?” above.

Personal data we receive from other sources

- Where appropriate and in accordance with any local laws and requirements, we will seek more information about you or your colleagues from other sources generally by way of due diligence or other market intelligence:
 - From third party market research and by analysing online and offline media (which we will do ourselves or employ other organisations to do for us);
 - From delegate lists at relevant events; and
 - From other limited sources and third parties.
- The types of information that we receive about you in this way may include information that others provide about you as described in the section entitled “What Kind of Personal Information Do We Collect?” above.

HOW DO WE USE YOUR PERSONAL DATA?

- In most cases, we will use your personal data for the purposes below 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.
- In most cases, we will use your personal data for the purposes below if we deem it necessary to do so for our legitimate interests. Article 6(1)(f) of the GDPR 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 Suppliers or other third parties in any way. 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 refer to the section entitled “How can you access, amend or take back the personal data that you have given to us” in the [General Privacy Information](#) section of this Privacy Policy.
- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information in relation to your jurisdiction, please click [here](#).

| Why and how we process your information | Types of personal data used | Legal basis relied upon |
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| <p>Storing Supplier and other third party details (and updating them where necessary) on Hays' database, so that Hays can contact Suppliers and third parties in relation to Hays' agreements and business relationships with these parties</p> | <ul style="list-style-type: none"> • Key identification and contact information • Information that others provide about you • Additional information that you choose to tell us | <p>Legitimate interests, namely it is in our interests and your interests:</p> <ul style="list-style-type: none"> • for us to reach out to you about the arrangements that we have in place |
| <p>Collecting and processing data in the course of and to the extent necessary to receive support and services from Suppliers and maintain business relationships with other third parties</p> | <ul style="list-style-type: none"> • Key identification and contact information • Additional information that you choose to tell us | <p>Legitimate interests, namely it is in our interests and your interests to:</p> <ul style="list-style-type: none"> • for us to, in certain circumstances, receive information from you about your services • conduct our business relationship with you <p>If you are an individual (e.g. a Supplier that operates as a sole trader) or you have entered or are about to enter into a contract with us or if you are making a request in the course of doing so, we may rely on the performance of a contract legal basis</p> <p>In limited circumstances, we may need to rely on the compliance with a legal obligation legal basis to the extent that we are compelled by applicable law to conduct various checks in relation to our Suppliers and other third parties e.g. in relation to verifying that social contributions are being paid and obtaining lists of overseas employees)</p> |

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| <p>Preserving, sharing and otherwise processing Supplier and third party data to establish, exercise or defend legal claims</p> | <p>The actual information used depends on the factual circumstances, but could include:</p> <ul style="list-style-type: none"> • Key identification and contact information • Information that others provide about you • Additional information that you choose to tell us | <p>Legitimate interests, namely it is in our interests to seek and receive legal advice should we need it and to protect ourselves in the context of litigation and other disputes</p> |
| <p>In certain jurisdictions, using a web-based video identity verification process to verify a Supplier or third party's identity and document this process</p> | <ul style="list-style-type: none"> • Key identification and contact information (including a copy of driving licence and/or passport/identity card) • Additional information that you choose to tell us • Video recording footage | <p>To the extent that this is carried out in your jurisdiction, we will ask for your consent before we start recording but rely on:</p> <ul style="list-style-type: none"> • compliance with a legal obligation to the extent that we are compelled by applicable law to verify your identity (e.g. in the context of payments services) • the legitimate interests condition to the extent that we are not legally required to verify your identity but it is in our legitimate interests to do so in order to maintain internal compliance standards <p>For more information in relation to your jurisdiction, please click here</p> |

Sharing of data

- Where we have identified you as a Supplier or other third party and unless you specify otherwise, we may share your information with any of our group companies and associated

third parties such as our service providers in order to get in touch with you about our services.

- We will generally rely on the same legal bases that we have referred to in the section above.
- If you would like to see a full list of who we will share your personal data with, please refer to the section entitled “Who do we share your personal data with” in the [General Privacy Information](#) section of this Privacy Policy.
- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information in relation to your jurisdiction, please click [here](#).

5. PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES, EMERGENCY CONTACTS AND DEPENDANTS

This section of the Privacy Policy applies to People Whose Data we receive from Candidates and Hays' Staff. These may include emergency contacts and referees. We will only contact them in appropriate circumstances.

WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT AND HOW DO WE COLLECT IT?

All we need from referees is confirmation of what you already know about our Candidate or prospective member of Staff, so that they can secure that job they really want. Emergency contact details give us somebody to call on in an emergency. To ask for a reference, we'll obviously need the referee's contact details (such as name, email address and telephone number). We'll also need these details if our Candidate or a member of our Staff has put you down as their emergency contact so that we can contact you in the event of an accident or an emergency.

We will collect your 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. We may also be provided (by inference) with some limited information about your sexual orientation if a member of our Staff identifies you as a spouse or partner when putting you down as a dependant, next of kin or emergency contact:

- **Key identification and contact information**
 - Name;
 - Age/date of birth;
 - Marital status;
 - Contact details;
 - Use of Staff member' company vehicle;
- **Special category information**
 - Details of sexual orientation (inferred) and physical or mental health, for example if this is necessary in connection with a beneficiary's entitlement to a benefit connected with their employment or where you disclose this through providing next-of-kin details;
- **Information that others provide about you**
 - Extra information that your referrer chooses to tell us about you;
 - Extra information that a member of Staff may tell us about you; and
- **Additional information that you choose to tell us**
 - Any other information that you may provide to us including when corresponding with us via email or otherwise.

Please note that the above list of categories of personal data we collect is not exhaustive. To the extent that you access our website or click through any links in an email from us, we will also collect certain data from you. If you would like more information about this, please refer to the Context-Specific section of this Privacy Policy that applies to Website Users.

HOW DO WE USE YOUR PERSONAL DATA?

We will only use the information that our Candidates or Staff give 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;
- If you were put down by a Staff member or Temporary Worker 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 or Temporary Worker 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; or
- If you were put down by a Candidate or prospective Staff member as a referee, we will contact you to get a reference or give your details to a third party to do this on our behalf. Where you are being asked to give a reference based on their professional experience of a Candidate, and where we think that you may be interested in becoming a Client of ours, we may also use your details to reach out to get in touch in that alternative capacity (subject to any local laws and requirements).

We will 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 and can find out more about how to do so by referring to the section entitled "How can you access, amend or take back the personal data that you have given to us" in the [General Privacy Information](#) section of this Privacy Policy.

Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information in relation to your jurisdiction, please click [here](#).

| Why and how we process your information | Types of personal data used | Legal basis relied upon |
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| <p>Collecting and processing data in the course of and to the extent necessary to:</p> <ul style="list-style-type: none"> • respond to accidents and emergencies, including by storing data of people whose data Hays receives from Candidates and Staff, such emergency contacts and dependants, on database • provide employee benefits and pay remuneration, including by storing data of people whose data Hays receives from Staff and Temporary Workers, such dependants, on | <ul style="list-style-type: none"> • Key identification and contact information • Additional information that you choose to tell us (e.g. information that you tell us in a recording) • Information that others provide about you | <p>Legitimate interests, namely it is in our interests and your interests for us to:</p> <ul style="list-style-type: none"> • have the means to contact you in the event of an accident or emergency; • provide any pay or remuneration due to you as part of Staff or Temporary worker benefits |

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| database, and sharing these with benefits providers where appropriate | | |
| Collecting and processing data of people whose data Hays receives from Candidates and Staff, such as referees, in the course of communicating with referees in order to obtain Candidate or Staff references, and sharing this data with third parties who require references where appropriate | <ul style="list-style-type: none"> • Key identification and contact information; • Additional information that you choose to tell us • Reference about a Candidate | Legitimate interests, namely it is in our interests to obtain Staff and Candidate references in the course of carrying out our services, and to verify details they have provided |
| Using the data of people whose data Hays receives from Candidates and Staff, such as referees, emergency contacts and dependants, to carry out marketing activities to promote Hays' services where Hays thinks the individual may be interested in becoming a Client (subject to any local laws and requirements) | <ul style="list-style-type: none"> • Key identification and contact information | We will obtain your opt-in consent |

Sharing of data

- Unless you specify otherwise, we will share your information with any of our group companies and associated third parties such as our service providers and organisations to whom we provide services.
- If you would like to see a full list of who we will share your personal data with, please refer to the section entitled "Who do we share your personal data with" in the [General Privacy Information](#) section of this Privacy Policy.
- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information in relation to your jurisdiction, please click [here](#).

6. WEBSITE USERS

This section of the Privacy Policy applies to Website Users.

Website Users include any individual who accesses any of the Hays websites or any of the Hays mobile applications (apps).

WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT?

We collect a limited amount of data from our Website Users which we use to help us to improve your experience when using our website or mobile apps and to help us manage the services we provide. This comprises information such as how you use our website or our mobile apps, the frequency with which you access our website or mobile apps, your browser type, your type of device, the location you view our website from, the language you choose to view it in and the times that our website is most popular. If you contact us via the website or the mobile apps, for example by using the chat function, or when you register for one of our newsletters, webinars or participate in any further offer of our website or mobile apps, we will collect any information that you provide to us, for example your name and contact details:

- **Key identification and contact information**
 - Names;
 - Telephone numbers;
 - Email addresses;
- **Automatically collected information**
 - Information relating to your online engagement with material published by Hays;
 - IP address;
 - Extra Usage information that you choose to tell us; including the dates, times and frequency with and location from which you access our services;
 - User choices;
 - User reports;
 - Log and troubleshooting information;
 - Device information when you install, access or use our services;
 - Account access information (e.g. PIN numbers for account verification purposes); and
- **Additional information that you choose to tell us**
 - Any other information that you may provide to us including when corresponding with us via email or otherwise,

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

HOW DO WE COLLECT YOUR PERSONAL DATA?

When you visit our website or mobile apps there is certain information that we will automatically collect, whether or not you decide to use our services namely your IP address, the date and the times and frequency with which you access the website or the mobile apps, the way you browse its content and other technical information. We will also collect data from you when you contact us via the website or the mobile apps, for example by using the chat function or when you register for one of our newsletters, webinars or participate in any further offer of our website or mobile apps.

We collect your data automatically via cookies or similar technology such as tracking pixels and HTML5 Local Storage in line with the cookie settings that you specify via the "Cookie Preferences"

link at either the top or bottom of the website, or the settings in your browser. If you are also a Candidate or a Client of Hays, we will use data from your use of our websites to enhance other aspects of our communications with or service to you. If you would like to find out more about cookies or similar technology, including how we use them and what choices are available to you, please refer to the section entitled “Cookies” in the [General Privacy Information](#) section of this Privacy Policy.

The types of information that we collect about you in this way include:

- Key identification and contact information; and
- Automatically collected information,

as described in the section entitled “What Kind of Personal Information Do We Collect?” above.

HOW DO WE USE YOUR PERSONAL DATA?

We use your data to:

- provide you with the service you registered for or the services you participated in, for example sending you a newsletter or taking part in an online survey;
- protect our Systems from attacks and other illegal activities; and
- to help us to improve your experience of using our website or our mobile apps, 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.

We will 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, you have the right to object and can find out more about how to do so by referring to the section entitled “How can you access, amend or take back the personal data that you have given to us” in the [General Privacy Information](#) section of this Privacy Policy.

If you would like to find out more about cookies or similar technology, including how we use them and what choices are available to you, please refer to the section entitled “Cookies” in the [General Privacy Information](#) section of this Privacy Policy.

Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information in relation to your jurisdiction, please click [here](#).

| Why and how we process your information | Types of personal data used | Legal basis relied upon |
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| Collecting and processing data in the course of and to the extent necessary to provide Website Users with services they register for, including newsletters and online surveys | <ul style="list-style-type: none"> • Key identification and contact information • Automatically collected information • Additional information that you choose to tell us | <p>We will rely on legitimate interests, namely it is in our interests and your interests for us to provide you with these services and for you to receive them in support of our core business activities relating to recruitment</p> <p>If you have entered or are about to enter into a contract with us or if you are making a request in the course of doing so, we may</p> |

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| | | <p>rely on the performance of a contract legal basis to the extent that the processing activity that we are seeking to conduct is necessary for the purposes of the contract or your request</p> <p>We will obtain opt-in consent before sending you any marketing materials</p> |
| <p>Collection of data via personalisation cookies/pixels and use of this data for profiling purposes so that Hays can show Website Users both targeted and personalised content. This will include:</p> <ul style="list-style-type: none"> personalising Website Users' website experience, including in relation to the roles that are brought to their attention when visiting the website making recommendations for editorial content that Hays thinks may be of interest to Website Users personalising the marketing content that Website Users receive via the website, email and other marketing channels (where they have consented to that marketing) <p>These personalisation cookies/pixels are used to understand how Website Users engage with the website by recording their</p> | <ul style="list-style-type: none"> Key identification and contact information Automatically collected information <p>More specifically, this will include:</p> <ul style="list-style-type: none"> Personal information and information about the Website Users searches (i.e. as submitted via form or pulled through from our Systems) Details of the Website Users' interactions with the website (e.g. applications, web page visits), and other information pulled through from the Systems (e.g. job title, past applications) Location data - either inferred from jobs, IP, or application history, or system stored data Digital identifiers - IP address, personalisation cookies | <p>We will obtain your consent via the Cookie Preferences link on our website before we place personalisation cookies/pixels on your device and enable this functionality</p> <p>If you do not wish to provide your consent to us placing a personalisation cookie on your device, please turn off the “Functionality Cookies” and “Advertising Cookies” options (please refer to our Cookies Policy)</p> <p>Please note that if you access our services across multiple devices, you may need to adjust your settings via the Cookie Preferences link on each of your devices</p> <p>Notwithstanding our collection of consent prior to placing personalisation cookies/pixels onto your device, we will rely on the legitimate interests condition in relation to the personalisation activities that we subsequently carry out</p> <p>We consider that it is in our interests (and sometimes your interests) to:</p> <ul style="list-style-type: none"> increase engagement with |

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| <p>visit to the website, the pages they have visited, the interactions they have made and the links they have followed. Hays will use this information to understand what Website Users may be interested in and tailor what they are shown and sent accordingly.</p> | <ul style="list-style-type: none"> • Website browsing data, form submission data and email engagement data • Marketing preferences | <p>and improve the experience of using our services by increasing the relevance of the content that you see across the Hays websites and email campaigns</p> <ul style="list-style-type: none"> • increase application numbers, conversion rates and application usefulness • encourage you to come back to our website by making the most helpful experience possible • reduce website bounce rate • increase email engagement rate (i.e. the frequency with which users click through) |
| <p>To prevent and take measures against fraud, illegal activities, infringement of Hays' rights or interests, or other attacks to Hays' Systems</p> | <ul style="list-style-type: none"> • Key identification and contact information • Additional information that you choose to tell us • Automatically collected information | <p>Legitimate interests, namely:</p> <ul style="list-style-type: none"> • it is in our interests and your interests for us to prevent and take measures against fraud, unauthorized use of our System and other illegal or harmful activity • it is in our interests to protect ourselves, you. and others • even if we are not under a legal obligation to share or otherwise process your data, |

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| | | <p>we will, under certain circumstances, have a legitimate interest in cooperating with law enforcement agencies, regulators and other bodies</p> <p>If we are under a legal obligation to share or otherwise process your data, compliance with a legal obligation, for example if we receive a valid legal request from a law enforcement agency, regulator or other body</p> |
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Sharing of data

- Unless you specify otherwise, we may share your information with any of our group companies and associated third parties such as our service providers in order to get in touch with you about our services.
- We will generally rely on the same legal bases that we have referred to in the section above.
- If you would like to see a full list of who we will share your personal data with, please refer to the section entitled “Who do we share your personal data with” in the [General Privacy Information](#) section of this Privacy Policy. Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information in relation to your jurisdiction, please click [here](#).

7. STAFF ALUMNI

This section of the Privacy Policy applies to Staff Alumni.

Staff Alumni include former members of Staff who have expressed their wish to remain part of Hays' alumni network and to use Hays' alumni portal.

WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT?

If you are a former member of Staff and you want to be part of our alumni network and use our alumni portal, we will collect your name, the contact details that you would like us to use and any other information you would like to provide to us for staying in touch with you. We may also retain certain types of data that we held about you relating to your time with us as a member of Staff:

- **Key identification and contact information**
 - Name;
 - Age/date of birth;
 - Sex/gender;
 - Photograph;
 - Marital status;
 - Nationality/citizenship/place of birth;
 - Contact details;
- **Education and employment information**
 - Education details;
 - Employment history; and
- **Additional information that you choose to tell us**
 - Any other information that you may provide to us including when corresponding with us via email or otherwise.

HOW DO WE COLLECT YOUR PERSONAL DATA?

If you are a former member of Staff, we will ask you if you wish to remain part of our alumni network and use our alumni portal just before your departure. If you are interested, we will ask you to provide your name and contact details to us and give you the option to opt into receiving marketing communications that we think will be of interest to you as one of our alumni.

HOW DO WE USE YOUR PERSONAL DATA?

If you are a former member of Staff and you want to be part of our alumni network and use our alumni portal, we will use your data to engage and stay in touch with you in order to maintain our relationship with you, including by:

- sending you newsletters and reports;
- inviting you to events;
- informing you about special vacancies;
- sending you news about Hays;
- inviting you to participate in opinion polls; and
- sending you messages on special occasions such as your birthday.

In most cases, we will use your personal data for the purposes below if we deem it necessary to do so for our legitimate interests.

Article 6(1)(f) of the GDPR 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.” If you are not happy about this, you have the right to object and you can find out more about how to do so by referring to the section entitled “How can you access, amend or take back the personal data that you have given to us” in the [General Privacy Information](#) section of this Privacy Policy.

Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information in relation to your jurisdiction, please click [here](#).

| Why and how we process your information | Types of personal data used | Legal basis relied upon |
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| Collecting and processing data in the course of and to the extent necessary to provide Staff Alumni with access to Hays' alumni network and alumni portal, including by storing Staff Alumni details on database | <ul style="list-style-type: none"> • Key identification and contact information (including data to create your alumni portal account) • Education and employment information • Additional information that you choose to tell us | Legitimate interests, namely it is in our interests and your interests for us to provide you with access to the alumni network, portal, and relevant resources |
| Collecting and processing Staff Alumni data in the course of carrying out Hays opinion polls To the extent that any data is published, this will be in aggregated/anonymised form only | <ul style="list-style-type: none"> • Key identification and contact information • Additional information that you choose to tell us | Legitimate interests, namely it is in our interests to: <ul style="list-style-type: none"> • improve and develop the experience that we provide to you considering your feedback and feeding this into our processes where we deem necessary |
| Collecting and processing Staff Alumni data in the course of communicating with Staff Alumni, including by: <ul style="list-style-type: none"> • Sending Staff Alumni newsletters and reports • Inviting Staff Alumni to events | <ul style="list-style-type: none"> • Key identification and contact information • Additional information that you choose to tell us | We will obtain your consent before using your data for marketing purposes. If you provide consent, you will be entitled to withdraw consent at any time We will otherwise rely on legitimate interests, namely it is in our interests and your interests to: |

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| <ul style="list-style-type: none"> • Informing Staff Alumni of special vacancies • Sending Staff Alumni messages on special occasions | | <ul style="list-style-type: none"> • recommend and grant you with access to our alumni resources and events |
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Sharing of data

- Unless you specify otherwise, we will share your information with any of our group companies and associated third parties such as our service providers and organisations to whom we provide services.
- If you would like to see a more detailed list of who we will share your personal data with, please refer to the section entitled "Who do we share your personal data with" in the [General Privacy Information](#) section of this Privacy Policy.
- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information in relation to your jurisdiction, please click [here](#).

8. VISITORS

This section of the Privacy Policy applies to Visitors.

Visitors include individuals who visit our premises but who are not members of our Staff.

WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT?

So you're looking for a bit more insight into what data we collect about you? Here's a more detailed look at the sorts of information that we will collect. The information described below is, of course, in addition to any personal data we are required by law to process in any given situation.

Depending on the relevant circumstances and applicable local laws and requirements, we will collect some or all of the information listed below. In some jurisdictions, we are restricted from processing some of the data outlined below. In such cases, we will only process the data in those jurisdictions to the extent and under the circumstances permitted by law:

- **Key identification and contact information**
 - Name;
 - Age/date of birth;
 - A copy of your driving licence and/or passport/identity card;
 - Vehicle registration number;
 - Email address;
- **Education and employment information**
 - Current job title/specialism/industry sector;
- **Special category information**
 - Details of your current health status (e.g. possible COVID-19 symptoms);
 - Temperature checks;
 - Vaccination history (including medical conditions relating to or affecting vaccination);
 - Details of travel arrangements where appropriate;
- **Automatically collected information**
 - IP address;
 - MAC address;
 - Device information when you install, access or use our services;
 - Location information (inferred from jobs, IP address, application history or system stored data);
 - Account access information (e.g. PIN numbers for account verification purposes);
 - CCTV footage;
- **Additional information that you choose to tell us in connection with your visit**
 - Registration details for facilities and sites; and
 - Purpose of your visit.

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

To the extent that you are visiting our premises as a Candidate, Client, Supplier/other third party or Temporary Worker, please also refer to the relevant Context-Specific section of this Privacy Policy which contains information about how we process your data in each of these scenarios in addition to the processing activities set out in this section.

HOW DO WE COLLECT YOUR PERSONAL DATA?

We collect Visitor personal data in the following ways:

- Personal data that you, the Visitor, give to us; and
- Personal data that we collect automatically.

Personal data you give to us

Hays needs to know certain information about you in order to provide you with access to its premises.

Hays will usually collect this information from you upon your arrival at our premises.

The types of information that receive from you in this way include:

- Key identification and contact information;
- Education and employment information;
- Special category information; and
- Additional information that you choose to tell us,

as described in the section entitled “What Kind of Personal Information Do We Collect?” above.

Personal data we collect automatically

To the extent that you connect to our Wi-Fi services, or are captured on our CCTV systems, where appropriate and in accordance with any local laws and requirements, we will also collect your data automatically (e.g. via website tracking scripts such as cookies or pixels) or through you providing it to us.

The types of information that collect about you in this way includes the Automatically collected information described in the section entitled “What Kind of Personal Information Do We Collect?” above.

HOW DO WE USE YOUR PERSONAL DATA?

We generally use Visitor data for Visitor Management purposes.

Visitor Management

- We have listed below various ways in which we will use and process your personal data for this visitor management purposes, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive.
- In most cases, we will use your personal data for the purposes below if we deem it necessary to do so for our legitimate interests. Article 6(1)(f) of the GDPR 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 activities in relation to which we rely on the legitimate interests condition prejudice Visitors in any way. 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 refer to the section entitled “How can you access, amend or take back the personal data that you have given to us” in the [General Privacy Information](#) section of this Privacy Policy.

- We may collect and use your health-related special category data for the purposes below if we deem it necessary to do so for vital or public interests. Article 6(1)(d) of the GDPR says that we can process your data where it “is necessary in order to protect the vital interests of the data subject or of another natural person”. GDPR Recital 46 adds that: “Some types of processing may serve both important grounds of public interest and the vital interests of the data subject as for instance when processing is necessary for humanitarian purposes, including for monitoring epidemics and their spread”. Article 9(2)(i) of the GDPR says that we can process your special category data where it “is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health”.
- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information in relation to your jurisdiction, please click [here](#).

| Why and how we process your information | Types of personal data used | Legal basis relied upon |
|---|---|---|
| <p>Collecting and processing personal data to the extent necessary to keep a record of Visitors to our premises, including by:</p> <ul style="list-style-type: none"> • Collecting data from Visitors upon arrival • Storing Visitor details on our Systems | <ul style="list-style-type: none"> • Key identification and contact information • Education and employment information • Additional information that you choose to tell us | <p>We will rely on legitimate interests, namely it is in our interests to keep a record of all visitors to our premises for visitor management purposes, and to ensure the protection and security of our premises</p> |
| <p>Collecting health and travel-related special category information to maintain the health and safety of Staff and other Visitors and to prevent the spread of and assess the risk of COVID-19 and other infectious viruses and diseases</p> | <ul style="list-style-type: none"> • Special category information | <p>We rely on legitimate interests, namely it is in our interests to protect our business from COVID-19 and other infectious viruses and diseases by monitoring the health and travel background of our visitors. We have to make sure our business runs smoothly and our Staff and other Visitors may be put at risk if we do not implement appropriate measures to ensure that our Visitors pass the appropriate checks.</p> <p>We may also rely on the vital interests and the public interest lawful bases, namely to protect against serious cross-border threats to health</p> <p>We may process your health and travel-related</p> |

| | | |
|--|---|--|
| | | information pursuant to Article 9(2)(i) of the GDPR to enable us to process health-related information arising from or in connection with the COVID-19 pandemic or as otherwise applicable to enable us to take steps, where appropriate, to ensure the health and safety of Staff and other Visitors and to prevent the spread of and assess the risk of COVID-19 and other infectious viruses and diseases |
| Recording and processing images and videos of Visitors captured by Hays' CCTV systems | <ul style="list-style-type: none"> Automatically collected information | We will rely on legitimate interests, namely it is in our interests and your interests to maintain and protect the security of our premises and our Staff and other by preventing and detecting security threats or other criminal or harmful activities |
| Retaining and processing electronic identification data collected from Visitors and their electronic devices to enable them to access IT services e.g. guest Wi-Fi | <ul style="list-style-type: none"> Key identification and contact information Automatically collected information | We will rely on legitimate interests, namely it is in our interests and your interests for us to provide IT related services on our premises, such as guest Wi-Fi services |

Sharing of data

- Where we have identified you as a Visitor and unless you specify otherwise, we may share your information with any of our group companies and associated third parties such as our service providers in order to get in touch with you about our services.
- We will generally rely on the same legal bases that we have referred to in the section above.
- If you would like to see a full list of who we will share your personal data with, please refer to the section entitled "Who do we share your personal data with" in the [General Privacy Information](#) section of this Privacy Policy.
- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information in relation to your jurisdiction, please click [here](#).

GENERAL PRIVACY INFORMATION

1. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

Where appropriate and in accordance with local laws and requirements, we generally share your personal data with the following categories of people:

- Any of our group companies;
- Appropriate colleagues within Hays (this may include colleagues in overseas offices);
- 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 examining bodies and 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);
- Service providers (whether third parties or our group companies) who perform functions on our behalf (including external consultants, business associates and professional advisers such as lawyers, auditors and accountants, administration functions, technical support functions and IT consultants carrying out testing and development 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; and
- If Hays 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.

There are also certain categories of people that we share your personal data with if you are a Candidate, Temporary Worker, Person whose data we receive (e.g. a referee) or Staff Alumni.

Candidates:

If you are a Candidate, we may also share your personal data with the following categories of people:

- potential employers and other recruitment agencies/organisations to increase your chances of finding employment;
- third party partners, job boards, job platforms, job aggregators, software providers and cloud based databases where we consider this will improve the chances of finding you the right job or improving recruitment processes more generally;
- MSP suppliers as part of our Clients' MSP programmes;
- third parties who we have retained to provide services such as reference, qualification and criminal convictions checks, to the extent that these checks are appropriate and in accordance with local laws;
- internal and external auditors of our Clients when we are required to share this data with them upon request in order to comply with our contractual or regulatory obligations; and
- third parties helping us by developing services and processes to optimise the Candidate selection process in order to improve the quality and efficiency of recruitment services.

Temporary Workers:

If you are a Temporary Worker, we may also share your personal data with the following categories of people:

- in limited circumstances as appropriate, medical professionals such as your GP or an occupational health specialist;
- the Client where you as a Temporary Worker are or will be working; and
- prospective employers (for example, when providing a reference, where permissible in accordance with local laws and requirements).

People whose data we receive:

If you are a referee of one of our Candidates, we may also share your personal data with the following categories of people:

- third parties who we have retained to provide services such as reference, qualification and criminal convictions checks, to the extent that these checks are appropriate and in accordance with local laws; and
- internal and external auditors of our Clients when we are required to share this data with them upon request in order to comply with our contractual or regulatory obligations.

Staff Alumni:

- If you are Staff Alumni, we may also share your personal data with a number of additional parties in order to facilitate our continuing relationship, for example, we may share your personal data with other Staff Alumni and associated third parties such as our service providers which operate our alumni portal.

2. 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 [here](#).

3. HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

- In determining the appropriate retention period for different types of personal data, we always consider the amount, nature, and sensitivity of the personal data in question, the potential risk of harm from unauthorised use or disclosure of that personal data, the purposes for which we need to process it and whether we can achieve those purposes by other means (in addition of course to ensuring that we comply with our legal, regulatory and risk-management obligations).
- We set out below the retention practices that we apply to certain categories of people.

Candidates:

- If you are a Candidate, we will keep your personal data on our Systems for a period of up to two years from the point that we collect such personal data or subsequently have meaningful contact with you (or, where appropriate, the company you are working for or with). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected. We may keep your personal data on our Systems for a longer period than this if we believe in good faith that we need to do so, for example, because of our obligations to tax authorities or in connection with any anticipated litigation.
- We will consider there to be meaningful contact with you in this context if you, for example, submit a CV to us via our website, take part in any of our online training, 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 for these purposes, only

where you click-through or reply directly – we will only deem that we have had meaningful contact with you if there is positive action on your part.

- For those Candidates whose services are provided via a third party company or other entity, meaningful contact with you means meaningful contact with the company or entity which supplies your services. Where we are notified by such company or entity that it no longer has that relationship with you, we will retain your data for no longer than two years from that point or, if later, for the period of two years from the point we subsequently have meaningful contact directly with you.
- If you have expressly indicated as a Candidate that you would rather we didn't retain your personal data, then we will Delete it from our Systems unless we believe in good faith that we need to preserve it, for example, because of our obligations to tax authorities or in connection with any anticipated litigation.

Temporary Workers:

- If we employ or engage you as a Temporary Worker directly, we will ordinarily process your data throughout the course of your Temp Relationship and will then retain it for a period after we have parted ways. The precise length of time will depend on the type of data, our legitimate business needs and other legal or regulatory rules that may require us to retain it for certain minimum periods. For example, we may be required to retain certain data for the purposes of tax reporting or responding to tax queries. We may also retain it if it might be relevant to any potential litigation. In jurisdictions that allow it, we will generally retain personal data relating to you where necessary to enable us to provide you or a future employer with a reference.
- If you are a Temporary Worker, we will also continue to process your personal data as a Candidate through the duration of your Temp Relationship and thereafter. The question of whether and the extent to which we will continue to process your personal data as Staff data through the duration of your Temp Relationship and thereafter depends on local law requirements. For more information in relation to your jurisdiction, please click [here](#).

Clients and Suppliers:

- If you are a Client or a Supplier we will retain your personal data in order to provide you with services or to receive services from you, or to provide you with information about our services that we believe you may be interested in.
- If you have expressly indicated that you're not interested in our services, then we will Delete your personal data from our Systems unless we believe in good faith that we need to preserve it, for example, because of our obligations to tax authorities or in connection with any anticipated litigation.

Website Users:

- If you are a Website User we will retain your IP address and any other information that is required to operate the website or our mobile apps for 365 days.

Other Categories of people:

- We will otherwise retain your data for as long as it is necessary to achieve the purpose it was collected or processed for. If this time has come or you have expressly indicated that you're not interested in one of our website or mobile app services anymore, we will Delete it from our Systems unless we believe in good faith that we need to preserve it, for example, because of our obligations to tax authorities or in connection with any anticipated litigation.

4. 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 will, where necessary, keep a record of your communications to help us resolve any issues which you raise.
- **Right to object:** 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, Temporary Workers, 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.
- **Right to withdraw consent:** Where we have obtained your consent to process your personal data for certain activities (for example, in order to use cookies or pixels in certain jurisdictions), 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.
- **Data Subject Access Requests (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. For more information in relation to your jurisdiction, please click [here](#).
- **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. For more information in relation to your jurisdiction, please click [here](#).
- 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.
- **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 involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.
- **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 involves 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.
- **Right of data portability:** If you wish, you have the right to transfer your personal data between data controllers. In effect, this means that you are able to transfer your Hays 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 will 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.

- **Right to lodge a complaint with a supervisory authority:** You also have the right to lodge a complaint with your local supervisory authority. Details of how to contact them can be found [here](#).
- 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), details of how to contact us can be found [here](#). Please note that we will, where necessary, keep a record of your communications to help us resolve any issues which you raise.
- You may ask to unsubscribe from job alerts and other marketing communications from us at any time. Details of how to do so can be found [here](#).
- 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.

5. WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA?

- You can find out which Hays entity is responsible for processing your personal data and where it is located by following this [link](#).
- If you have any comments or suggestions concerning this Privacy Policy please follow this [link](#). We take privacy seriously so we'll get back to you as soon as possible.

6. HOW DO WE STORE AND TRANSFER DATA INTERNATIONALLY?

- So you want to know more about how we store and transfer your data internationally? In order to provide you with the best service and to carry out the purposes described in this Privacy Policy, your data will be transferred:
 - between and within Hays entities;
 - to third parties (such as advisers or other Suppliers to the Hays business);
 - to overseas Clients where applicable;
 - to Clients within your country, where applicable, who may, in turn, transfer your data internationally;
 - to a cloud-based storage provider; and
 - to other third parties as set out in the section entitled "Who do we share your personal data with" above.
- 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
 - 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

- by way of scheme approved by the European Commission (whether as a successor to the Privacy Shield or otherwise) which regulates exchanges of person data between jurisdictions; 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.

7. COOKIES POLICY

What's a cookie?

- A “cookie“ (or similar technology such as a tracking pixel) (“Cookie”) is a very small text file or graphic that is placed on your device when you visit a webpage or open an email and which records your behaviour (such as navigation of a website). Cookies are used to enhance your use of the various Hays digital channels, for example by enabling us to present tailored content and options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes.
- Cookies are used by nearly all digital channels and do not harm your system. We use them irrespective of whether you interact with Hays via our website, an app or other digital channel, and regardless of whether you are a Candidate, Temporary Worker, Client, Supplier, Website User or someone else.
- If you want to check or change what types of Cookies you accept, this can usually be altered using the privacy settings within your browser, or you can do so very easily using the “Cookie Preferences” link at either the top or bottom of the website. Please note that if you access Hays' services across multiple devices, you may need to adjust your settings via the Cookie Preferences link on each of your devices.

How do we use Cookies?

- We use Cookies to do the following:
 - to personalise your experience of our digital channels and to enhance their functionality, for example:
 - to keep you signed in to your account throughout your visit;
 - to tailor and increase the relevance of the content that you see (which may vary depending on whether you are a Candidate, Temporary Worker, Client, Supplier, Website User or someone else, and also according to your preferences) which we hope will in turn increase engagement with and improve the experience of using our services (and encourage you to return);
 - if you are a Candidate, to personalise marketing content that we make available to you via our digital channels (where you have consented to that marketing) which we hope will increase application numbers, conversion rates and application usefulness;
 - to understand how you engage with our website and other digital channels, for example by tracking the pages you have visited, the interactions you have made, the links you have followed, and the number of job ads and articles read. This

enables us to understand how you use our digital channels, tailor what we show and send to you, and track any patterns that emerge individually or from larger groups. This helps us to develop and improve our digital channels and services in response to what our visitors want and need (and we understand that those wants and needs vary depending on whether you are a Candidate, Temporary Worker, Client, Supplier, Website User or someone else) which in turn helps us increase engagement with and improve the experience of using our services by increasing the relevance of the content that we serve. Also, as described above in the sections on “Profiling, Algorithms and Automated Decision Making”, the process of analysing web-based behaviours enables us to award Candidates a weighted “approachability score” with a view to providing insights into Candidates’ needs and allow Hays to follow up where needed, and Consultants use these scores as part of shortlisting and ranking Candidates and as a factor in determining whether to approach/show roles to a Candidate, which will serve to supplement other data that Hays holds about the Candidate; and

- if you are a Candidate:
 - to help us advertise jobs to you that we think you’ll be interested in, by personalising the roles that are brought to your attention;
 - to personalise our recommendations for editorial content (such as reports about developments in your industry) that we think may be of interest;
 - to enrich Candidate data and existing profiles about Candidates that we already hold on our Systems;
 - analysing data obtained by tracking and monitoring Candidates’ experience and account activity in order to profile Candidates and allocate them to “talent pools” based on their attributes and behaviours (e.g. previous roles, skills, industry experience, location, or when a Candidate is willing to work) – as described above in the sections on “Profiling, Algorithms and Automated Decision Making”, the assignment of Candidates to talent pools is a fully automated process and can involve the use of bots.

Hopefully this means less time for you trawling through endless pages and will get you into the employment you want more quickly.

- Cookies are either:
 - Session cookies: these are only stored on your device during your browser session and automatically expire when you close your browser – they allow the website to recognise and link your actions during a browsing session and usually store an anonymous session ID allowing you to browse a website without having to log in to each page, but they do not collect any information from your device; or
 - Persistent cookies: a persistent cookie is stored on your device in between browsing sessions and so it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again. We use persistent cookies for Google Analytics and for personalisation (see above for more information about what personalisation may involve and also the sections above on “Profiling, Algorithms and Automated Decision Making”).
- Cookies can also be categorised as follows:
 - **Strictly required cookies:** These cookies are essential to enable you to use the website effectively, such as when applying for a job, and therefore cannot be turned off. Without these cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.
 - **Functionality cookies:** These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify

traffic sources and see which parts of the site are most popular. Furthermore these cookies allow our website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customise. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymised.

- **Advertisement cookies:** These cookies help us to advertise details of potential job opportunities that we think may be of interest. These cookies are persistent (for as long as you are registered with us) and mean that when you log in or return to the website, you may see advertising for jobs that are similar to jobs that you have previously browsed.

The Cookie Preferences link on our website provides a list of the Cookies we use in your jurisdiction, why we use them and what types of Cookies they are.

How to manage or reject Cookies

- When you first visit our website(s) you will be asked to choose what kind of Cookies you want to receive. We ask for your prior consent for some Cookies via the Cookie Preferences link, while we may set strictly necessary Cookies without your consent. You may also use the privacy settings within your browser to do this. Please be aware that rejecting all Cookies through your browser's privacy settings will mean that you may not be able to take full advantage of all our website's features. Each browser is different, so check the "Help" menu of your browser to learn how to change your Cookie preferences.
- You can update your given consent at any time via the Cookie Preferences link. You may also choose to opt-out of Cookies which are not strictly necessary to perform basic features of our website by changing your browser settings. If you use the Cookie Preferences link to update your choice of Cookies, please note that this does not result in deletion of already placed Cookies on your device. If you want to delete these Cookies you should do so using your browser's privacy settings.
- If you choose to delete all Cookies through your browser's privacy settings, this will also delete any record of having opted-out that may be stored by a Cookie on your device (so that the opt-out can continue to be actioned) and you may need to actively opt-out again.

8. THIRD PARTY SERVICES

- In the course of using our services, Candidates, Temporary Workers and Staff Alumni may wish to access independent websites and third party services (e.g. job platforms) which are not operated by us. Such independent sites and third parties are not under our control, and we are not responsible for and have not checked and approved their content or their privacy policies (if any). You will need to make your own independent judgement about whether to use any such independent sites, including whether to use any services offered by the third party.
- Occasionally, third party service providers that we have engaged will process personal data that we given to them as a data controller in their own right, for example, for the purposes of: (i) conducting their own internal reporting, (ii) preventing or responding to threats to the security or integrity of their systems; (iii) establishing, exercising or defending their own legal claims; (iv) complying with legal obligations that apply to them; and (v) using personal data in anonymised or aggregated form to improve their own products and services. They will usually have their own privacy policies which set out more detail in relation to these processing activities.

GLOSSARY

- **Candidates** - include individuals with whom Hays has not had prior contact, but whom Hays reasonably considers would be interested in, or might benefit from, Hays' services and being considered for any roles advertised or promoted by Hays including permanent, part-time and temporary positions and freelance roles with Hays' Clients (including those individuals who want to become Temporary Workers). Candidates also include applicants for such roles, as well as people who have supplied a speculative CV to Hays not in relation to a specific job, and/or who have engaged with Hays about Hays' services and/or any roles advertised or promoted by Hays. Individual contractors, freelance workers and employees of suppliers or other third parties put forward for roles with Hays' Clients as part of an MSP offering or otherwise will be treated as Candidates for the purposes of this Privacy Policy.
- **Clients** - while it speaks for itself, this category covers our customers, clients, and others to whom Hays provides services in the course of its business or whom Hays reasonably considers would be interested in our services. In certain circumstances, Hays provides services to individual employees who work for Client organisations, such as training courses to teaching staff who work for Clients in the education sector. Please note that in this context, Hays requires Clients to communicate the relevant parts of this Privacy Policy (namely the sections directed at Clients) to their employees.
- **Delete** – In this day and age it is virtually impossible to guarantee the permanent and irretrievable deletion of electronic data. In addition, as we have explained to you in this Privacy Policy, sometimes we will be obliged by law or regulation, or need for risk-management reasons, to retain the ability to access certain elements of personal data. However, our commitment to you is that once your personal data reaches the end of its nominal retention period, or where we receive a valid request from you to erase it, we will put in place specific operational and Systems measures to ensure that your data is “put beyond use”. By this we mean that while the data will still technically exist on an archive system, we will ensure that it cannot be readily accessed by any of our operational Systems, processes or Staff. Only a very (and we mean exceptionally) small number of senior Staff, in very (and, again, we mean exceptionally) limited and carefully prescribed situations, will be able to restore your personal data so that it can be viewed for those legitimate purposes. Once we are clear that all relevant legally mandated retention periods have expired (which, for present purposes, we expect to be the period of seven years), we will go the additional final step of undertaking a “hard delete”, whereby not even that very limited number of senior Staff would be able to restore your personal data.
- **General Data Protection Regulation (GDPR)** – a European Union statutory instrument which aims to harmonise European data protection laws. It has an effective date of 25 May 2018, and any references to it should be construed accordingly to include any related national data protection legislation.
- **Managed Service Provider (MSP) programmes** – Clients' outsourcing of the management of external staff (including freelance workers, independent contractors and temporary employees) to an external recruitment provider.
- **Other people whom Hays may contact** – these may include Candidates' and Hays' Staff emergency contacts and referees. We will only contact them in appropriate circumstances.
- **Recruitment Process Outsourcing (RPO) services** – full or partial outsourcing of the recruitment process for permanent employees to a recruitment provider.
- **Staff** – includes current and former employees and interns engaged directly in the business of Hays (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 Hays (even

though they are not classed as employees). For these purposes we also include employees of Hays who are engaged to work on Clients' premises under the terms of RPO or MSP agreements. To be clear, 'Staff' does not include individuals hired by Hays for the purpose of being placed with Clients outside of an RPO/MSP arrangement. These individuals are treated in the same way as Hays' Candidates and are covered by this Privacy Policy. Likewise, independent contractors and consultants performing services for Hays fall within the definition of a 'Supplier' for the purposes of this Privacy Policy.

- **Suppliers** – refers to partnerships and companies (including sole traders), and atypical workers such as independent contractors and freelance workers, who provide services to Hays. In certain circumstances Hays will sub-contract the services it provides to Clients to third party suppliers who perform services on Hays' 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, Hays requires Suppliers to communicate the relevant parts of this Privacy Policy (namely the sections directed at Candidates) to their employees.
- **Staff Alumni** – refers to former members of Staff who have expressed their wish to remain part of Hays' alumni network and to use Hays' alumni portal.
- **Systems** – telephone, computer, internet and Wi-Fi systems, software and portals, accounts and/or networks belonging, controlled or used by Hays that are used to transmit, undertake and/or receive communications or are otherwise used in the course of Hays' business, including candidate portal software and CRM systems.
- **Temp Relationship** – means our contractual relationship with Temporary Workers while they are employed or engaged directly by us.
- **Temporary Workers** – includes someone who becomes employed or engaged by Hays for the purposes of undertaking temporary work for a Client or other Hays group company. If you are a Temporary Worker, we will also continue to process your personal data as a Candidate throughout the duration of your temporary work assignment and thereafter, in accordance with the terms of this Privacy Policy. The question of whether and the extent to which the Recruits Privacy Policy and the Staff Privacy Policy apply to you as a Temporary Worker depends on local law requirements. For more information in relation to your jurisdiction, please click [here](#).
- **UK GDPR** – the GDPR as it forms part of the Laws of the UK by virtue of Section 3 of the UK European Union (Withdrawal) Act 2018.
- **Visitors** – means individuals who visit Hays premises but who are not members of Hays' Staff.
- **Website Users** – any individual who accesses any of the Hays websites or any of the Hays mobile applications (apps).

ANNEX 1 – HOW TO CONTACT US

| Country in which you use Hays' services or supply Hays with services | Hays entity responsible for processing the personal data of Website Users | The Hays entity responsible for processing the personal data of Candidates, Clients, Suppliers and the emergency contacts and referees of Candidates and Hays' Staff will depend on which of the below companies is the counterparty associated with the relevant arrangement | How you can get in touch with us: <ul style="list-style-type: none"> to access, amend or take back the personal data that you have given to us; if you suspect any misuse or loss of or unauthorised access to your personal information; to withdraw your consent to the processing of your personal data (where consent is the legal basis on which we process your personal data); with any comments or suggestions concerning this Privacy Policy | How you can get in touch with us to update your marketing preferences |
|--|---|---|---|--|
| Germany | Hays AG, Mannheim | <ul style="list-style-type: none"> Hays AG, Mannheim Hays Professional Solutions GmbH, Düsseldorf Hays Talent Solutions GmbH, Düsseldorf Emposo GmbH, Mannheim Hays Holding GmbH, Mannheim | <p>You can write to us at the following address: Hays AG, Datenschutzbeauftragter/DPO, Willy-Brandt-Platz 1-3, 68161, Mannheim, Germany</p> <p>Alternatively, you can send an email to our Data Protection Officer and the data protection team: datenschutz@hays.de.</p> | <p>You can do this by updating your profile here.</p> <p>Alternatively you can email us at: service@hays.de or by clicking the unsubscribe link in any marketing e-mail we send to you.</p> |

| | | | | |
|--|--|---|--|--|
| | | <ul style="list-style-type: none">• Hays Beteiligungs GmbH & Co. KG, Mannheim | | |
|--|--|---|--|--|

In the event that more than one of the Hays entities listed above jointly determines the means and purposes of processing personal data of the types of individuals listed above, the Hays entities will process such personal data as joint controllers for the purpose of Article 26(1) of the GDPR.

We adhere to the requirements imposed by the GDPR in relation to the establishment of joint controller relationships between Hays entities.

If you wish to exercise your rights under the GDPR in relation to the processing of your personal data by Hays entities operating on a joint controller basis, please contact us using the channels set out above.

ANNEX 2 – HOW TO CONTACT YOUR LOCAL SUPERVISORY AUTHORITY

| Country in which you use Hays' services or supply Hays with services | Details of your local supervisory authority |
|--|--|
| <p>Germany</p> | <p>For the entities located in Mannheim/Baden-Württemberg, Der Landesbeauftragte für den Datenschutz und die Informationsfreiheit Baden-Württemberg.</p> <ul style="list-style-type: none"> • Post: Postfach 10 29 32, 70025 Stuttgart • Email: poststelle@lfdi.bwl.de • Phone: (+49) 0711/61 55 41 – 10 • Fax: 0711/61 55 41 – 15 <p>For the entities located in Düsseldorf/North Rhine-Westphalia, Der Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen.</p> <ul style="list-style-type: none"> • Post: Postfach 20 04 44, 40102 Düsseldorf • Email: poststelle@ldi.nrw.de • Phone: +49 (0)211/384 24 – 61; +49 (0)211/38424 – 86 • Fax: 0211/384 24 – 10 |

ANNEX 3 – COUNTRY-SPECIFIC VARIATIONS TO OUR PRIVACY POLICY

| JURISDICTION | COUNTRY-SPECIFIC LEGAL REQUIREMENT |
|-----------------------|---|
| <p>Germany</p> | <p><u>Referees</u></p> <p>Where a referee is being asked to give a reference based on their professional experience of a Candidate, we will not use the referee's details to reach out to get in touch in the alternative capacity as a Client unless we are explicitly asked to do so by the referee.</p> |
| | <p><u>Prospective Candidate Data</u></p> <p>In relation to the ways in which we collect your data, if we collect your personal data from a third party online platform/website that prohibits data scraping in its terms of use, we will take this into account in determining whether to collect your data from such sources.</p> <p>We use Prospective Candidate data to work out whether you might be interested in, or might benefit from, our services, and to assess whether and how we might be able to assist you. If we think we can help, we will use your contact details to get in touch with you and find out if you are interested in our services. In Germany, we do this not via email, but via phone or messages via a the job network (unless you have consented to be contacted via email).</p> |
| | <p><u>Use of sensitive or special category Candidate Data</u></p> <p>Race or ethnic background</p> <p>In Germany, we collect details of our Candidates' religious affiliation to facilitate our payroll process. As this is a necessary legal requirement, we will not seek your explicit consent to process this information.</p> |
| | <p><u>DSARs</u></p> <p>In accordance with local law, we have the right to refuse to respond to your DSAR in circumstances where your data are only being held: (i) pursuant to a legal obligation to retain them; or (ii) for the purposes of monitoring data protection or safeguarding data, in each case where providing the information would require a disproportionate effort, and appropriate technical and organisational measures make processing for other purposes impossible.</p> |
| | <p><u>Requests to erase your data</u></p> |

Where your data are not being processed in an automated way, unless your data are being processed unlawfully, we will not be required to erase your data if erasure would be impossible or would involve a disproportionate effort due to the specific method of storage, provided that we think your interest in erasure is minimal.

Where your data are being processed in an automated way, we will also have the right to refuse to erase your data if we have reason to believe that such erasure will adversely affect your legitimate interests, or if such erasure would cause us to breach any legal obligation to retain your data for a specific period. Instead, in these circumstances, processing of your data will be restricted in the particular ways envisaged by the GDPR.

Marketing, Retargeting and Market Research Purposes

Soft-opt-In

As described in the main body of our Privacy Policy, we are entitled to rely on "soft-opt-in" consent in respect of certain marketing messages that we wish to send to you. The conditions that apply to our using of soft-opt-in consent are that: (i) we have obtained your email address in connection with the sale of goods or services; (ii) we use that address only for direct advertising of our own (or substantially similar) services; (iii) you have not objected to this use; and (iv) we clearly advise you, in each such communication, of your right to opt-out.

Opt-in

In all other e-marketing circumstances, we are required to obtain your specific "opt-in" consent and we are required to keep records of such consent having been received. To comply with our obligations under the Act Against Unfair Competition, we undertake what is commonly known as the "double-opt-in" consent procedure, which is where we first ask you to opt-in to receive e-marketing, and we then send you an email asking you to confirm that you have given your consent. We may only add you to our marketing list once we have received this second email confirmation.

Retargeting

When you consented to the transfer of data to our advertising partners we send your data (e.g. your email address, your name, your phone number) in an encrypted and pseudonymised way (so called "hashed") to our advertising partners (for a list of our advertising partners, see below). They compare this data with the data they already process about you and if they match, the partners enable us to run targeted advertising on those matches or on similar groups of people like you, which means the partners display on their platforms Hays advertising which are specially designed for you or for people like you. After the creation of the matches, your encrypted data is automatically deleted again at our partners. The partners do not gain new addresses as a result of this. We think this is a great benefit for you as you get only those advertising which suits your needs.

Hays group companies & Hays advertising partners

When we mention Hays group companies in Germany, Austria, Denmark and Switzerland in the context of our advertising consent wording, we mean the following legal entities:

- Hays AG, based in Germany
- Hays Professional Solutions GmbH, based in Germany
- Hays Talent Solutions GmbH, based in Germany
- Emposo GmbH, based in Germany
- Hays Holding GmbH, based in Germany
- Hays Beteiligungs GmbH & Co.KG, based in Germany
- Hays Vorrat 01 GmbH, based in Germany
- Hays (Schweiz) AG, based in Switzerland
- Hays Talent Solutions (Schweiz) GmbH, based in Switzerland
- Hays Österreich GmbH, based in Austria
- Hays Professional Solutions Österreich GmbH, based in Austria
- Hays Specialist Recruitment Denmark A/S, based in Denmark

When we talk about advertising partners in the context of our advertising consent wording, we mean the following partners:

- Facebook Inc, based in the USA, (<https://www.facebook.com/about/privacy/update>)
- LinkedIn Corporation based in the USA, (https://www.linkedin.com/legal/privacy-policy?trk=homepage-basic_footer-privacy-policy)
- Google Ireland Limited, based in Ireland (<https://policies.google.com/privacy>)

Transfer outside of the EWR

Where we have asked you for your marketing consent regarding our advertising partners and where those parties are located outside of the European Economic Area, you consent (Art. 49 I a GDPR) to a transfer outside of the European Economic Area, and you are aware that there might be a lower level of data protection with these providers/countries than it is the case in the European Economic Area.

There might be in particular a risk that your data may be accessed through authorities for surveillance purposes, even without legal redress procedures. Exercising data protection rights, you know, and you are familiar with under the GDPR may be more difficult or even impossible.

Market Research Purposes

When you consented to the use of your personal data for market research purposes, this means that we will run surveys regarding satisfaction, NetPromoterScore, personnel topics, wishes, offers, socio-demographic characteristics, new platform testing, test groups, UX testing and brand panels.

Certain aspects of German law suggest a blurring of the line between recruitment candidates and employees. While we do not consider that this blurring was intended to apply in respect of candidates in the context of a recruitment business, should that not be the case, we would rely on the employment-specific provisions of the GDPR (and German law, i.e. the German Data Protection Act-new) to ensure that we can continue to process your data fairly and lawfully.

The employment-specific provisions permit the processing of personal data of employees for employment-related purposes where necessary for hiring decisions or, after hiring, for carrying out or terminating the employment contract or to exercise or satisfy rights and obligations of employees' representation laid down by law or by collective agreements or other agreements between the employer and any staff council. For more information, please see section 26 of the German Data Protection Act-new.

ID Check for Pay-Agent Services (for Suppliers and Clients)

Purpose of data collection / kind of data we collect

As we provide you payment services according to § 10 Section 1 ZAG, we are obliged by the Money Laundering Act to establish the identity of each of our contractual partners or the person acting on their behalf and to document this. For this purpose, we use a web-based video identity verification process to make identification as convenient as possible for you. During this procedure, a Hays employee or an employee of our service provider, acting on our behalf and according to our instructions, will ask you to identify yourself by means of a camera. The interview will be recorded audio-visually and various images (screenshots) will be taken of the ID document you are using (the front and back, the respective security features), as well as of yourself. For this purpose, we ask you in at the outset of the interview, but before we start recording, for your consent under banking law in relation to the following:

("We will take photos of you, as well as of the complete front and back of your ID card (including its security features) once in the course of this identity verification. Furthermore, the video call now conducted for the purpose of establishing your identity will be recorded visually and acoustically. We will store this data in accordance with our legal obligations. In this way, we will be able to provide proof that we have properly executed the videoident at any time upon request by the applicable regulatory authority.")

Furthermore, the information contained on your identification document (for example, first name, last name, citizenship, etc.) is documented, stored and otherwise processed as part of the identity verification process.

Our processing of this information is necessary to ensure that we have identified you correctly and to document the identity verification process correctly.

Legal Basis

Article 6 I c GDPR (compliance with a legal obligation), Article 6 I a GDPR (consent) and §§ 11, 8 GwG (Money Laundering Act)

Retention Period

In accordance with the requirements of the Money Laundering Act, we retain the documents produced in their entirety for the duration of our business relationship with you or your organisation and beyond that for a period of 5 years.

Alternatives

Video identification is the fastest and most convenient method for you to identify yourself to us. We can and will also offer you alternative solutions for identification if you ask us about this and explicitly request an alternative.

ID Check for all other Hays services (for Candidates and Suppliers)

Purpose of data collection / kind of data we collect

In today's virtual age, we unfortunately no longer meet many of our candidates, temporary workers and suppliers in person. As a result, we need to verify the identity of people (or in the case of organisations, people acting on their behalf) that we are seeking to do business with. This is done in for our own legitimate interests, namely to maintain internal compliance standards as well as to comply with our legal obligations (for example, we are obliged not to provide any or only limited services to "sanctioned persons").

For this purpose, we use a web-based video identity verification process to make identification as convenient as possible for you. During this process, a Hays employee or an employee of our service provider, acting on our behalf and according to our instructions, will ask you to identify yourself using a camera. The interview will be recorded audio-visually and various images (screenshots) will be taken of the ID document you are using (the front and back, the respective security features), as well as of yourself. For this purpose, we ask for your consent at the outset of the interview, but before we start recording in relation to the following:

("We will take photos of you, as well as of the complete front and back of your ID card (including its security features) once in the course of this identity verification process. Furthermore, the video call now conducted for the purpose of establishing your identity will be recorded visually and acoustically. We will store this data in accordance with our legal obligations.")

Furthermore, the information contained on your identification document (for example, first name, last name, citizenship, etc.) is documented, stored and otherwise processed as part of this identity verification process. Afterwards, we check this information and if it turns out for us that the check was successful, we delete this data. In the event of discrepancies, we will clarify these with you and retain the data for this period.

This information is necessary to ensure identification and to document the identity verification process correctly.

Legal Basis

Article 6 I f GDPR (legitimate interests condition)

Retention Period

We keep the data collected during the call for the period of the identity check and delete it afterwards. This period is usually a few days. After a successful identity verification check, we will keep a note on your file that your identity has been checked for the duration of our business relationship and for a period of 3 years beyond that.

Alternatives

Video identification is the fastest and most convenient method for you to identify yourself to us. We can and will also offer you alternative solutions for identification if you ask us about this and explicitly request an alternative.