

## WORKFORCE UK – WEBSITE PRIVACY NOTICE

Welcome to Workforce UK's website (the "Website"). Your privacy matters to us, and we are committed to protecting your personal data in line with UK data protection laws. This Privacy Notice explains what personal data we collect from you when you visit or interact with our website, how we use it, and what rights you have. Please read it carefully, as by continuing to use our website you agree to the practices described here.

When we say, "Workforce UK," "we" or "us," we mean:

- Workforce International UK Limited
- Workforce International Scotland Limited
- Soar Professional Services Limited

including their subsidiaries, affiliates, divisions, holding companies, partnerships, joint ventures, and associated companies ("Workforce Group"). Our registered office is at 124 City Road, London, EX1V 2NX.

Workforce UK operates as part of The Workforce Group, a group of companies providing a wide range of human resources and talent management services. These include:

- Staffing and recruitment services (permanent, temporary and contract placements)
- Payroll services and secondment arrangements
- Talent acquisition, testing solutions and career transition support.
- Talent development, training, and education programmes
- Outplacement services and international mobility solutions

We work with clients across multiple sectors, connecting skilled candidates to opportunities and supporting employers in building strong and effective teams.

This Policy (along with other referenced documents) outlines the personal information we collect from you and the methods we use to collect, utilize, and process it, in the context of your use of the Website.

This policy sets out our commitment to ensuring that any Personal Data which we process is carried out in compliance with Data Protection Law (Data Protection Act 2018, UK General Data Protection Regulation (UKGDPR) and all relative European Union and Member State data protection legislation in force and as amended or replaced from time to time). We are committed to ensuring that good data protection practice is embedded in the culture of our staff and our organisation.

This Policy does may not address particular handling of personal data in any other relationship you may have with Workforce UK, including but not limited to those of a business partner, employee, candidate, or associate. For details on how personal data is processed in those contexts, please refer to the applicable agreements/privacy policy.

### 1. What personal information does the Company collect and use

We collect and use personal information to provide you with the best user experience, which we have grouped together as follows:

- **Identity Data** means your name and documents evidencing your identity.
- **Contact Data** means your email addresses, telephone numbers, postal addresses, country, job title and company name and other information that could be on your business card.
- **Technical Data** means internet protocol (IP) addresses from which you access our or others' products and services, cookies (as set out in our Cookies Policy), your login data (such as the time, date and duration), the browser type and version you use to access our websites, apps, and products and services, weblogs, traffic data, the time zone setting of your device and your device location, browser plug-in types and versions that you used, other communication data, the resources that you access on our websites, apps and products and services, the operating system and platform type of the device you use, and details of other technology on the devices you use to access this website.

- **Contact Forms and Surveys Data** means any information you provide to us when you use our contact forms (for example using the “Contact”, “Send us a Message”, “Stay in touch” functions on our websites, apps, products or services), or when you participate in a survey (including its content), the record of that correspondence and other information or personal information you share with us when completing our contact forms in your sole discretion. (Please note that form fields marked with an asterisk (\*) are mandatory fields, because we need this information to comply with or respond to your request.)
- **Marketing Communications Data** means information about how you respond to email, SMS, phone, other marketing campaigns and when you sign up to receive our newsletters or our latest news, developments, and research.
- **Social Media Data** means your profile data and other information you made public on or otherwise share with us from social media.

Depending on the relevant circumstances and applicable local laws and requirements, we may collect some of the information listed above when you visit our website, provide us with your business card, talk to us at a conference or other event, or if you are a customer or prospective customer.

We collect and use personal information to deliver our products and services, to send you information that you requested, or to contact you to provide additional information on our available products and services as more particularly detailed in section 2 below.

**2. Why do we process your personal information and how long do we keep it for**

Purposes of the processing	Type of data	Legal basis to process your personal information	Retention period
To respond to your request or questions or provide information when you contact us or make a request to us.	Contact forms and Surveys Data	Consent	2 years after the last contact
To send you direct marketing via e-mail, messaging, phone, social media, or any other channel. This includes information such as events or newsletters that may be of interest to you.	Identity Data Contact Data Marketing Communication Data  Social Media Data if applicable	Consent where we are required under the law to obtain consent for marketing. Fulfilment of our legitimate interests to promote our products and services where we are not obliged to obtain consent by law	Until the end of the subscription or for as long as you have opted in to receive our marketing communication
To keep you informed about our service.	Identity Data Contact Data Marketing Communication Data  Social Media Data if applicable	Consent where we are required under the law to obtain consent for marketing. Fulfilment of our legitimate interests to promote our products and services where we	Until the end of the subscription or for as long as you have opted in to receive our marketing communications

		are not obliged to obtain consent by law	
To best tailor Content, the Website, and resources according to your preferences, to improve them to better serve you and to present it in the most effective manner for you.	Technical Data	Fulfilment of our legitimate interests to administer our websites and provide you with relevant information about our products and services	IP address: 14 days. For the Cookies Data, please refer to our <a href="#">Cookies Policy</a> .
To respond to your request or questions or provide information when you contact us or make a request to us.	Technical Data	Consent	IP address: 14 days. For the Cookies Data, please refer to our <a href="#">Cookies Policy</a>
To respond to your request or questions or provide information when you contact us or make a request to us.	Technical Data	Consent	IP address: 14 days. For the Cookies Data, please refer to our <a href="#">Cookies Policy</a> .
To allow you to participate in interactive features of the Website, when you choose to do so	Technical Data	-Fulfilment of our legitimate interests to administer our websites and provide you with relevant information about our products and services	IP address: 14 days. For the Cookies Data, please refer to our <a href="#">Cookies Policy</a> .
To further develop and improve the Website and systems to better serve you.	Technical Data	-Fulfilment of our legitimate interests to administer our websites and provide you with relevant information about our products and services	IP address: 14 days. For the Cookies Data, please refer to our <a href="#">Cookies Policy</a> .

Where we rely on our legitimate interest to process your personal data to enable and develop the activities underpinning our business and service offerings to you, we believe that your interests are not affected in a negative or disproportionate way.

### 3. How do we collect your personal information

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

- **Direct interactions.** You may give us your Identity Data, Contact Data, Contact Forms and Surveys Data, Marketing Communications Data and Social Media Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal information you provide when you:
  - apply for our products or services;
  - create an account on our website;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - enter a competition, promotion, or survey; or
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal information by using cookies and other similar technologies and from the communications we receive from your browser. Please see our Cookie Policy for further details about how we use cookies and other similar technologies.
- **Third parties or publicly available sources.** We will receive personal information about you from various third parties and public sources as set out below:
  - Public information made available by you on social media and similar websites and apps;
  - Public information about you in directories, for example of professional memberships or qualifications.

#### 4. What marketing communications do we send

##### Communication with Individuals

We will only send marketing communications to you, as an individual, if you have consented to us doing so.

To receive marketing or promotional communications, you can opt-in by checking the relevant box located on the form on which we collect your data, or we can send you these communications based on our legitimate interests to promote our products and services where we are not obliged to obtain your consent by law

##### Communication with Businesses

We process your data within the scope of an existing business relationship with you or your company because:

- We have a contract with you (or are considering entering into a contract with you). In this case, the personal information we collect and use for marketing purposes relates to individual employees of our clients and other companies with which we have an existing business relationship; or
- It is in our legitimate interests for the conduct of our business activities (for example, to communicate with you in a 'business to business' capacity in order to promote our products and services that we believe will be of interest to you or your company). In that regard, we may also obtain contact information from public sources, including content made public at social media websites, to make an initial contact with a relevant individual at a client or other company; or
- You consented to receive our marketing communications via e-mail as an individual at our clients/companies. In this case, we will send you marketing communications to develop or maintain a business relationship in accordance with applicable electronic and marketing communications laws. These communications may include web beacons, cookies, and similar technologies that allow us to know whether you open, read, or delete the message, and links you may click on. We will usually offer you a check box on the forms we use to collect your personal information. If you agree to receive the communications, you must click the box.

##### How to unsubscribe

In any case, where we send marketing communications to you via email, you may opt out of receiving any further marketing communications by clicking the 'unsubscribe' or 'opt-out' function in the email.

In addition, you can also exercise your opt-out right at any time by contacting us (please indicate the marketing communications you would like to opt out of receiving).

#### **5. Do we use artificial intelligence**

Yes, we do use artificial intelligence (AI) at times. However, we do not use your personal information in any automated decision making (a decision made solely by the creation and application of technologies without any human intervention) or profiling (processing of personal information with a range of technologies that reduce human intervention to evaluate certain conditions about an individual) that produces a legal effect or similarly significant effect concerning you.

We use a range of technologies to analyse data. In case of our website, we might use your search terms for recommendations of job offerings. In all cases, there is always human intervention in these processes, as we use these tools to support our expert human decision makers.

We use automated systems/processes with the conditions described in the previous paragraph to recommend and display alternative search results to your search query. The main aim of this is to broaden the choice of job offerings to choose from. Accordingly, these AI systems do not have legal effect.

For example, when you are searching for a job, we may display alternative but close job offerings as well. The piece of processing that might use AI (for instance machine-learning, logic- or knowledge based and statistical approaches) is based on Natural Language Processing techniques to calculate similarities of words and word meanings. In any case these results are only shown to you as recommendations to make an informed decision about your application.

#### **6. Do we share your data with third parties**

To facilitate our efficient use of your information and to provide you with the content and/or resources and/or services, we disclose your information to third parties. However, this disclosure will only occur in the following circumstances:

- **To our service providers /suppliers.** We will, for example, engage a supplier to carry out administrative and operational work in support of our relationship with you. The supplier(s) will be subject to contractual and other legal obligations to preserve the confidentiality of your data and to respect your privacy, and will only have access to the data they need to perform their functions; the relevant suppliers are typically IT suppliers (who host or support our IT systems, including information about you), premises management companies (who look after physical security at our buildings, and therefore need to know about you to allow access to our buildings) and back office finance and accounting management providers (who need to handle details of candidates in order to process accounts payable and receivable).  
We also engage suppliers who provide IT technology services and solutions. This category of third parties includes, Firefish, Zoho
- **To members of The Workforce Group, our affiliates, or companies with which we have an association, partners, or joint ventures to which the Company and/ or Workforce Group is a party (“Third Party Associates”)** within or outside the UK. Your information may be shared with them for different reasons always in line with strict contractual boundaries relating to Data privacy and in line with our legislative requirements and with the purposes for which we process your personal data. This may include:
  - information shared with The Workforce Group and its Third Party Associates that provide IT functions for The Workforce Group companies worldwide for our legitimate interests;
  - information is also shared with The Workforce Group and its Third Party Associates (including the legal entities acquired after the collection of information) for the purposes previously described or to propose offers to you adapted to your profile where you have consented to global data sharing within The Workforce Group and its Third Party Associates to provide you with local or international opportunities in that market;

- information is also shared with The Workforce Group and its Third Party Associates worldwide for administrative purposes based on our legitimate interests.
- **To government or law enforcement authorities.** We will share your data with government, police, regulators, or law enforcement agencies authorities if, at our sole discretion, we consider that we are legally obliged or authorised to do so or it would be prudent to do so.
- **To prospective sellers or buyers and their advisors.** As part of due diligence relating to (or implementation of) a merger, acquisition, or other business transaction, we may need to disclose your data to the prospective seller or buyer and their advisors.

#### **7. Do we transfer your personal information outside of your country**

Your personal data can be transferred and processed in one or more other countries, in or outside the UK or Ireland. A full list of the countries in which we and The Workforce Group and its Third Party Associates operate is available here.

We shall only transfer data to those parties set out in Section 7 above who are outside the UK or Ireland:

- to countries which the European Commission, the UK Information Commissioner or the Swiss Federal Data Protection and Information Commissioner believes offers an adequate level of protection to you pursuant to Article 45 of the UK and EU GDPR or Article 6 of the Swiss Federal Data Protection Act (Article 16 revised Act), or;
- where we have put in place appropriate safeguards to seek to preserve the privacy of your information.

#### **8. What data security measures do we have in place**

We understand how important is to protect your personal information. We have implemented operational procedures and adequate technical and organizational security measures to prevent any unauthorised access, alteration, deletion, or transmission of this personal information.

Although we will do our best to protect your personal information, you should be aware that the transmission of information via the internet is not completely secure and we cannot guarantee the security of your personal information transmitted to the Website or any third party; for this reason, any transmission is at your own risk.

#### **9. What are your rights regarding your personal information**

Under applicable data protection laws, you have the following rights:

- **Right to access and obtain a copy of your personal information**  
You are entitled to request confirmation of whether we process any of your personal information. Where this is the case, you may have access to your personal information and to certain information about how it is processed. In some cases, you can ask us to provide you with an electronic copy of your information. In some limited circumstances, you also have the right to request that we transfer (“port”) your personal information direct to another third party provider.
- **Right to correct your personal information**  
If you can demonstrate that the personal information, we hold about you is not correct, you can ask that this information is updated or otherwise corrected.
- **Right to be forgotten or to delete personal information**  
In certain circumstances you have the right to have your personal information deleted. You may make such a request at any time, and we will evaluate if your request should be granted, however this right is subject to any legal obligations we may have to retain data. For situations where in accordance with the law, we determine that your request to have your personal information deleted must be granted, we will do so without undue delay.
- **Right to restrict or object to the processing of your personal information**  
In certain circumstances you have the right to obtain restriction of the processing of your personal information, or to object to certain processing thereof on grounds relating to your particular situation.

- **Right to withdraw consent**

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

If you want to exercise any of your rights, please contact us using the contact details set out below.

Finally, you have the right to lodge a complaint with the data protection authority in the place where you live or work, or in the place where you think an issue in relation to your personal information has arisen.

In the **United Kingdom**, the relevant Supervisory Authority is: Information Commissioner's Office (ICO):

Website: <https://ico.org.uk/>.

#### 10. **How do we manage changes to this Privacy Notice**

The terms of this Privacy Notice may change from time to time. We shall publish any material changes to this Privacy Notice through appropriate notices either on this Website or contacting you using other communication channels.

#### 11. **Contact**

In case you

- have any questions or concerns regarding this Privacy Notice,
- would like further information about how we protect your information (for example when we transfer it outside your country) in the operation of this website, or
- want to contact the Workforce's Data Protection Officer (DPO), please email [info@workforceinternational.co.uk](mailto:info@workforceinternational.co.uk)

In case you have any other question or concern in relation with how your information is processed in any other capacity than that of a website visitor:

- you can contact the DPO at [info@workforceinternational.co.uk](mailto:info@workforceinternational.co.uk).
- To exercise any of your rights related to your personal information, please fill in this form.

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