

## HR DATA PRIVACY NOTICE

### ABSTRACT

This document sets out the information that Aistemos Limited is obliged to make available to data subjects under the General Data Protection Regulation, concerning how it obtains and uses their personal data in the context of recruitment and employment

### RECORD OF ISSUE

Issue	Date	Author
1-00	24-05-2018	JN & LR

## 1. INTRODUCTION

- 1.1. This Privacy Notice applies to personal data controlled by Aistemos Limited (“**Aistemos**”).
- 1.2. Aistemos is committed to protecting the personal information and privacy of its staff, customers, and other stakeholders.
- 1.3. This Privacy Notice, together with any other documents referred to in it, sets out the basis on which any personal data that we collect from or about you, or that you provide to us, in relation to your recruitment or employment by Aistemos, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we treat it.
- 1.4. For the purpose of the General Data Protection Regulation, the data controller is Aistemos Limited (company no. 08644182), whose registered office is at 39-41 Charing Cross Road, London WC2H 0AR, United Kingdom.
- 1.5. We may update this Privacy Notice from time to time. Any changes we make in the future will be posted on the Aistemos website. Please check back regularly to see any updates or changes.

## 2. PRIVACY MANAGER

- 2.1. The contact details for our Privacy Manager are as follows:

Privacy Manager  
Aistemos Limited  
Third Floor.  
12 East Passage  
London  
EC1A 7LP  
United Kingdom

E: [Privacy@Aistemos.com](mailto:Privacy@Aistemos.com)

D: +44 (0) 20 3909 9200

- 2.2. It is the responsibility of the Privacy Manager to ensure that our organisation and our staff are kept informed and advised about their obligations to comply with data protection laws, to monitor compliance with those laws, to advise on data protection impact assessments, to train staff and conduct internal audits, and to be the first point of contact for supervisory authorities and for individuals whose personal data we are processing.
- 2.3. You can contact the Privacy Manager using the above details if you wish to invoke any of your rights as a data subject, or if you have any other questions or concerns about personal data and privacy matters. Please include the words DATA PRIVACY REQUEST in the subject line of your email, or at the top of your letter.

### **3. PARTICULARS OF PROCESSING**

- 3.1. We process personal data about job candidates and staff in a range of ways, and for a range of purposes.
- 3.2. The categories of person about whom we process personal data are described in more detail in the Particulars of Processing that are set out in the Schedule to this Privacy Notice.

### **4. YOUR RIGHTS AS A DATA SUBJECT**

- 4.1. This Section 4 sets out the rights that you have as a data subject, by reason of the General Data Protection Regulation. If you wish to invoke any of these rights, please notify our Privacy Manager.
- 4.2. You have the following rights:
  - 4.2.1. The right to request access to the personal data that we hold about you (also known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
  - 4.2.2. The right to request rectification of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
  - 4.2.3. The right to request erasure of the personal data that we hold about you (also known as "the right to be forgotten"). This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
  - 4.2.4. The right to request restriction of processing about you. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
  - 4.2.5. The right to object to processing. Where we are processing your personal data solely on the grounds that there is a legitimate interest to do so, and there is something about your particular situation which makes you want to object to processing on this ground, then this enables you to challenge the processing. You also have the right to object where we are processing your personal information for direct marketing purposes.
  - 4.2.6. The right to data portability. This enables you to ask us to transfer your personal information to another party in certain circumstances.
- 4.3. Where our processing of personal data is based on your having given consent, you have the right as a data subject to withdraw that consent at any time.
- 4.4. You have the right to lodge a complaint with a supervisory authority. In the United Kingdom, the supervisory authority is the Office of the Information Commissioner, full contact details for which can be found at <https://ico.org.uk/global/contact-us/>

## SCHEDULE

## PARTICULARS OF PROCESSING

<b>Category of data subject</b>	Job applicants, current employees and contractors, and former employees and contractors
<b>Categories of personal data that we process</b>	<ul style="list-style-type: none"> <li>• Name, address and other contact details</li> <li>• Date of birth</li> <li>• Nationality (and work permit details where relevant)</li> <li>• Academic history and qualifications</li> <li>• Career history, referee details and references</li> <li>• Salary and benefit entitlement</li> <li>• Bank account details</li> <li>• National insurance number</li> </ul>
<b>Source of information</b>	The above personal data is received direct from the data subject.
<b>Purposes of the processing</b>	<p>We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:</p> <ol style="list-style-type: none"> <li>1. Where we need to in order to enter into and/or perform a contract of employment or consultancy agreement with you.</li> <li>2. Where we need to in order to comply with a legal obligation.</li> <li>3. Where it is necessary to do so, for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Those legitimate interests include the hiring and management of staff, including the conduct of disciplinary and grievance procedures.</li> </ol> <p>We may also use your personal information in the following situations, which are likely to be less common:</p> <ol style="list-style-type: none"> <li>4. Where we need to in order to protect your interests (or someone else's interests).</li> <li>5. Where it is necessary to do so in the public interest or for official purposes.</li> </ol>
<b>Lawful basis of processing</b>	The lawful basis of processing is (a) that the processing is undertaken with the consent of the data subject, and/or (b) that the processing 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, and/or (c) that the processing is necessary for the purposes of the legitimate interests pursued by Aistemos.

<b>Recipients of the personal data</b>	<p>The personal data that we hold about job applicants, current employees and contractors, and former employees and contractors, may be disclosed:</p> <ol style="list-style-type: none"> <li>1. To prospective employers who ask us for a reference, where we have the specific permission of the individual to such disclosure.</li> <li>2. To third-party service providers such as HR and payroll services companies, pension administrators, benefits providers, training providers, legal advisers, and IT service providers.</li> <li>3. To the police, HMRC, and other official bodies as required by law.</li> </ol>
<b>Overseas transfers</b>	<p>None.</p>
<b>Duration of processing</b>	<p>We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.</p> <p>The appropriate retention period for any given type of personal data depends on a range of factors, including the nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which it was collected, and the applicable legal requirements.</p>
<p><b>Is the provision of this personal data a statutory or contractual requirement, or a requirement necessary to enter into a contract?</b></p> <p><b>If so, is the data subject obliged to provide the personal data in question?</b></p> <p><b>What are the possible consequences of failure to provide such data?</b></p>	<p>You are not obliged to provide the personal data in question. However, if you do not provide the personal data, we may be unable to process your application for employment and/or to perform the contract we have entered into with you (e.g. paying you or providing benefits). Failure to provide all the required personal data may also prevent us from complying with our own legal obligations (such as to ensure staff health and safety).</p>
<p><b>Is there any automated decision-making done using the personal data (including profiling)?</b></p> <p><b>If so, (a) what logic is involved, and what are the significance and envisaged consequences of the processing for the data subject?</b></p>	<p>No.</p>
<b>Plans for further processing</b>	<p>None.</p>