

PRIVACY NOTICE - WEBSITE VISITORS

THE COMPANY AND THE COMPANY POLICY

This policy is applicable to all businesses, offices and operations within the gap personnel group www.gap-personnel-group.com (referred to as The Company), including:

- Open Up Group Inc. – Company Reg – 8044442
- gap personnel Holdings Limited (including Hawk 3 Talent) – Company Reg – 3589208 – ICO - Z2057848 - <https://www.gap-personnel.com/>
- global personnel Limited – Company Reg – 11828264 – ICO - ZA841201 - <https://global-personnel.com/>
- gap technical Limited – Company Reg – 5646432 – ICO – ZA230558 - <https://www.gap-technical.com/>
- gap personnel (TELFORD) LTD – company Reg – 13377649 – ICO – ZB346100 - <https://www.gap-personnel.com/>
- Quattro Recruitment Limited t/a gap personnel – Company Reg – 7131120 – ICO – ZA015243 - <https://www.gap-personnel.com/>
- Quattro Healthcare Ltd t/a gap healthcare – Company Reg - 9389534 – ICO – ZA127351 - <https://www.gap-healthcare.com/>
- Driving Force Recruitment Limited - company Reg – 06538808 – ICO - Z1709668 - <https://www.driving-force.co.uk/>

Our parent company is Open Up Group Inc. which is a global human resources and staffing provider; Open Up Group Inc. 3F NBF Comodio Shiodome, 2-14-1 HigashiShimbashi, Minato-ku, Tokyo 105-0021.

The Company is a recruitment business which provides work-finding, recruitment, training and related services to its clients and work-seekers. The Company must process personal data so that it can receive these services – in doing so, the Company acts as a data controller. We will only use your personal data in accordance with the terms outlined in our contracts and our privacy notice.

1. COLLECTION AND USE OF PERSONAL DATA

We may collect personal data on your visits to our website including, but not limited to, your IP address, browser, timestamp, content from surveys and contact forms and other communication data and the resources that you access. Our collection of this personal information will make your visit to the website easier in the future as we will be able to suggest content that is relevant to you based on the location you access the website from, what content you access and how you interact with it; At times this information may be utilised for our internal analysis of website performance.

We may use your personal information to send you direct marketing via email and other communication means when consent via selecting an opt-in for this purpose in the relevant contact form. You may opt-out of receiving future marketing communications at any time by clicking opt out on our marketing email.

1.1 COLLECTION OF DATA

The Company will collect your personal data via a number of routes, including but not limited to the methods detailed below. In any case the Company must have a legal basis for processing your personal data, which may include sensitive data. We will only use your personal data in accordance with the terms of a contract and our privacy notice.

1.1.1 CONTACT FORM

we will collect any information you provide to us when you use our contact forms. If you contact us, we will keep a record of that correspondence. Fields we request include but are not limited to: your first name, last name, company name, job title, email address, telephone number, job details, industry, your location.

1.1.2 OUR SIMPLE GUIDE TO COOKIES – WHAT IS A COOKIE?

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies do lots of different jobs, like letting you navigate between pages efficiently remembering your preferences, and generally improve your web site experience. They can also help to ensure that adverts you see online are more relevant to you and your interests.

We can split cookies into 4 main categories:

- Category 1: strictly necessary cookies
- Category 2: performance cookies
- Category 3: functionality cookies
- Category 4: targeting cookies or advertising cookies

Category 1 - Strictly necessary cookies

These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies services you have asked for, like register for job alerts, cannot be provided. Please be aware our site uses this type of cookie

Analytics

This is a small cookie that allows the site owner to check which pages are the most popular on the site and so provide more site content that is popular to users. It contains no personal or private data at all and is used on millions of websites worldwide.

Remember Me

This is used when you ask the system to remember your login and stores the email address you use to login only.

Shortlist

This is used to be able to remember jobs you place in your shortlist, and is classed as essential to the site functionality and thus can be stored regardless of your selection to ensure the site works. However we wanted to bring this to your attention as we are keen not to hide anything from you.

Category 2 - Performance cookies

These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

By using our website and online services, you agree that we can place these types of cookies on your device.

Category 3 - Functionality cookies

These cookies allow the website to remember choices you make (such as your user name and password) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymous and they cannot track your browsing activity on other websites.

By using our website and online services, you agree that we can place these types of cookies on your device.

Category 4 - targeting cookies or advertising cookies

These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisations.

We do have links to other web sites and once you access another site through a link that we have provided it is the responsibility of that site to provide information as to how they use cookies on the respective site. We use the following social media channels that may put category 4 cookies on your device:

- Facebook
- Twitter
- YouTube
- LinkedIn

You can find more information about cookies by visiting www.allaboutcookies.org or www.youronlinechoices.eu.

Google also have a brief video which explains the use of cookies.

1.2 LOG FILES

We use IP addresses to analyse trends, administer the site, track users' movements, and to gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

1.2 PURPOSE OF PROCESSING AND LEGAL BASES

The legal bases we rely upon when providing and/or offering to provide these services to you are:

Legal base	Example of purpose
Legal obligation	Does not apply
Contractual obligation	Does not apply

Legal base	Example of purpose
Legitimate interest	We rely upon legitimate interest when processing your personal data collected through: a) the website cookies to provide you with a better experience, but also help to us improve our website and services. b) when you provide your data over our on-line contact form for the purposes of work-finding, recruitment, training and related services.
Consent	We rely upon your consent to use your data for purpose of direct marketing. You have the right to withdraw that consent at any time by clicking unsubscribe on our marketing email or by emailing Data Protection Officer dpo@gap-personnel.com
Public interest	Does not apply
Vital interest of data subject	Does not apply

1.3 RECIPIENTS/S OF DATA

Where we need to share your personal and/or sensitive data, we have contracts and data sharing agreements in place with the recipients that require them to treat your information as confidential and ensure the continued protection of your data whilst in their possession. The Company will process your personal data and/or sensitive data, with the following recipients:

- Our parent company and any of our group companies;
- Governing bodies, law enforcement, regulators and any other authorities as required by law;
- Our software providers, including IT, CRM, Website, Marketing technology platforms and suppliers;
- Our social networking platforms, groups and therefor any other members of the public who view those platforms;
- Third party suppliers, e.g. business associates and professional advisers, such as external consultants, technical and IT support functions, payroll companies, pension provider, insurers, legal advisors, independent auditors and intermediaries;
- We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or a part of any business restructuring or reorganisation. However, we will take steps with the aim of ensuring that your privacy rights continue to be

2. OVERSEAS TRANSFERS

The Company may transfer the information you provide to us to countries outside the European Economic Area ('EEA'). The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein. The most common reason for this is since our parent company Open Up Group Inc. is based in Japan. Whenever your data is shared with Open Up Group Inc. it is done so through our UK based secure SharePoint system.

Whenever your data is shared, inside or outside of the EEA, we will take every step possible to ensure adequate protections are in place to ensure the security of your information.

3. AUTOMATED DECISION-MAKING DRAFT AMENDS

The company does not use automated decision-making, including profiling that would impact you in the capacity and purposes for which we hold your data. Should the company intend to change this process you will be notified in advance.

4. DATA ACCESS RESTRICTION AND RETENTION

Data submitted via online contact form will be archived after 2 years, and kept for future 5 years with restricted access to it.

Should you being provided with our services please see relevant Privacy Notice for data retention schedule. After expiry of that period your data will no longer be kept by gap personnel.

Where the Company has obtained your consent to process your personal data we will do so until you withdraw it, otherwise it will be kept in line with the schedule detailed in relevant Privacy Notice were services have been provided.

5. SECURITY PRECAUTIONS IN PLACE TO PROTECT THE LOSS, MISUSE OR ALTERATION OF 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, e.g.:

- a) encryption of our services and data;
- b) review our information collection, storage and processing practices, including physical security measures;
- c) restrict access to personal access to personal information;
- d) internal policies setting out our data security approach and training for employees, these include measures to deal with any suspected data breach.

Our systems are placed on servers dedicated to The Company, running on an industry standard virtualisation platform based on VMware. Our server provider, where we store most of the data, is ISO 27001 accredited and follows industry best practice and regularly patches and upgrades platforms. All servers that we use to store your data are placed in UK area and comply with the General Data Protection Regulation. Our security systems are kept up to date and align with the guidance to security information.

The server that holds the Candidate Portal is installed with an SSL certificate to protect your data. Once you are on the Candidate Registration Portal, a padlock icon will appear near the address bar of the browser you are using; this will confirm you are on our secure Candidate Portal system.

5.1 EXTERNAL WEBSITES

The Company's website may contains links to other external websites. Please be aware that the Company is not responsible for the privacy practices of such other sites. When you leave our site we encourage you to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by the Company's website.

6. YOUR RIGHTS

Please be aware that you have the following data protection rights:

- a) The right to be informed about the personal data the Company processes on you;
- b) The right of access to the personal data the Company processes on you;
- c) The right to rectification of your personal data;
- d) The right to erasure of your personal data in certain circumstances;
- e) The right to restrict processing of your personal data;
- f) The right to data portability in certain circumstances;
- g) The right to object to the processing of your personal data that was based on a public or legitimate interest;
- h) The right not to be subjected to automated decision making and profiling; and
- i) The right to withdraw consent at any time.

Where you have consented to the Company processing your personal data and sensitive personal data you have the right to withdraw that consent at any time by completing on-line request (click here) or emailing Data Protection Officer dpo@gap-personnel.com

7. COMPLAINTS OR QUERIES

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: Data Protection Officer by emailing dpo@gap-personnel.com

You also have the right to raise concerns with the Information Commissioner's Office (ICO) on 0303 123 1113 or at <https://ico.org.uk/concerns/> or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.

PRIVACY NOTICE – WEBSITE VISITORS – VERSION 7 – 01.09.2022