

PRIVACY NOTICE FOR CANDIDATES AND POTENTIAL CANDIDATES OF SQUARE ONE – MAY 2018

Square One Resources Limited (“Square One”) is committed to protecting and respecting your privacy.

This policy sets out the basis on which your personal data will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how it will be treated by us.

For the purpose of the General Data Protection Regulations (the “Regulations”) the data controller is: Square One Resources Limited (company registration number 03110911) of 6 Devonshire Square, London, EC2M 4YE.

Square One are not required by the GDPR to have a Data Protection Officer, however, for any queries relating to your data, please direct your queries to Paul Savill, CFO, who will be able to deal with your query, or redirect to the appropriate person in Square One’s Data Protection team. Both Paul and the Team are contactable through the dedicated email address: gdpr@squareoneresources.com

DATA PRIVACY PRINCIPLES

The core data privacy principles below are the foundation of this policy:

Lawfulness, fairness and transparency

Square One shall process personal information fairly, and in accordance with this policy and applicable laws.

Data Accuracy

Square One will take all reasonable steps to ensure that personal information is accurate and complete and will rectify or erase any incorrect personal information without delay.

Purpose Limitation

Square One will ensure that personal information collected is for specified, explicit and legitimate purposes and only to the extent necessary to fulfil those purposes.

Data Retention

Square One will only keep personal data for as long as is necessary to fulfil the purposes for which it was collected or to comply with applicable law/for tax purposes/for Government or regulatory requirements.

Data Security

All personal information collected will be processed in a secure manner.

PURPOSE AND LAWFUL BASIS OF PROCESSING

This policy is intended to be relevant to those individuals that are looking to be/are/were candidates of Square One. If this is not you, please refer to the relevant policy.

If this is the relevant policy for you, Square One will be acting as the recruitment agency and we will need to take those reasonable and legal steps to ensure that we comply with our obligations in that capacity. Our basis for “processing” your data will either be with your consent or in accordance with our legal obligations or legitimate business interests as your recruitment agency. These obligations will differ

depending on what stage we are at with regard to your engagement, but for reference, some categories have been set out below:

Pre-Engagement

- In order to consider you as a potential candidate at Square One, we will need certain pieces of information from you at different stages of the process.
- At the initial stage (submission), information that we may process will include your contact details, CV and other information relating to your suitability for the particular role. This will have been provided to us with your consent, and you will not be submitted for a particular role unless you have first consented to do so.
- If suitable, then we will be trying to get you in for an interview as soon as possible!
- If successful, we will need to send you a contract for the supply of Services (for contract placements only) and we may require further information from you, such as your address, email address etc.
- If you no longer wish to be considered for a role at any stage during these initial stages, you have the right to withdraw your consent and you can advise us how you want to handle any data we may hold (for example, if you simply decided that now wasn't the right time to be put forward for a role, then we could keep your details and contact you again in the future).
- If we do not contact you or receive any contact from you for 3 years, your data will be deleted. Please note that we may retain your data for a longer period if required to do so for tax purposes or to enable us to comply with any Government or regulatory requirements.

Engagement

- Firstly, congratulations on successfully obtaining the role!
- You will have received the relevant contract together with a number of other standard on-boarding documents that all candidates are provided with.
- We will now require additional information from you either to comply with legal obligations on us as a recruitment agency or where it is reasonable for us to process such information in light of the agency-candidate relationship. Some examples of such information are:
 - A copy of your passport in line with local requirements, and/or other identity documentation.
 - Your bank details and national insurance number if applicable.
 - HR related records (appraisals, file notes, references).
 - Medical records – if required specifically by a client.
 - Insurance documents.
- Due to the fact that we engage with other parties for your engagement, e.g. clients, we may need to forward relevant data to those parties. For the avoidance of doubt, we will only transfer data if it is reasonable and relevant to do so.
- Some information may be provided to these parties with your consent, but we will highlight these sections to you, which may include:
 - Next of kin details (if applicable).
 - Diversity/equality questionnaires.These will not be sent without your prior consent.

Post-Engagement

- Where the engagement is terminated for whatever reason, most of your data will be deleted within a reasonable period of time, which in the ordinary course will be 5 years from such termination.
- Some data will be retained for longer if this a requirement of the HMRC guidelines. At the time of drafting, guidelines would suggest that such data should be retained for 7 years.

- Some data may also be retained for a longer period of time in order to further legitimate business interests. At the time of drafting, our policy is to retain such data for 6 years, unless there are extreme reasons for a longer period.
- Should there be additional grounds (for example, if there is an ongoing discussion with a client about a placement and the client is querying the services provided) for a longer period of retention, then we will advise you of the same where this is reasonably practicable.

We will not transfer your data outside of the EEA, unless this is required by the client for example. If this is the case, your prior consent will be obtained before any such transfer of your data. Where this does become necessary, we will inform you first. For the avoidance of doubt, we will only transfer your data outside of the EEA where we have made sure that appropriate safeguards are in place, including relevant contractual assurances being provided by the recipient in line with the Regulations. If required, we can provide you with copies of such assurances from the recipient.

Marketing

It is important to us to keep you up to date with the latest job opportunities, roles and information. We will ask for your consent to us contacting you for marketing purposes every 6 months, and you are free to unsubscribe at any time. If you do not respond to these consent emails, we will remove you from our mailing list.

Existence of data subjects rights

Under the Regulations, there are additional rights afforded to data subjects (i.e. you). For example, you may have the right:

- To be informed (which this Policy seeks to address);
- Of access to your data that we process and a copy thereof;
- To request rectification if data we hold is inaccurate;
- To be forgotten (subject to conditions);
- To request that the processing of data is restricted (subject to conditions);
- To request data be provided to you in a particular format (subject to conditions);
- To object to the processing of data (subject to conditions).

Automated decision making.

We are particular with our selection process. We take all reasonable steps to ensure that we have selected the right candidate and will not rely on an “automated process” to determine who that is. We have a dedicated team that will review applications/CV’s/hand-written letters rather than a search engine.

Right to lodge a complaint

Please be assured that we will do all we can to ensure that your data is treated carefully, in accordance with this Policy and the Regulations. Should you feel that we have not done so at any stage, please let us know so that we can make the necessary adjustments or clarifications. At first instance, if you send an email to gdpr@squareoneresources.com, we will aim to deal with your concerns as a matter of urgency. Should you feel that we have still not dealt with your concerns, or if you feel that it is serious enough, you have the right to make a complaint to the Information Commissioner. For further details, please see www.ico.org.uk.