



Global Talent 2020 Privacy Notice

1 About us

Global Talent 2020 Limited ("**we/us/our**") is committed to protecting and respecting your privacy.

This notice sets out the basis on which we process your personal data, whether we collect personal data directly from you or your personal data is provided to us by a third party. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

We are a **controller** for the purposes of the General Data Protection Regulation (Regulation (EU) 2016/679), the Data Protection Act 2018 and related data protection legislation.

Global Talent 2020 Limited is a company incorporated in Scotland with registered number SC657001 and having our registered office address at 22 Stafford Street, Edinburgh, Scotland, EH3 7BD.

2 How to contact us

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us at enquiries@globaltalent2020.com.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

3 Privacy Information

We are committed to protecting your personal data and your privacy. This privacy notice aims to give you information on how we collect and process your personal data:

- through your use of our website globaltalent2020.com, including any personal data that you may provide through our Website.
- where we have a contract in place with you (please note that separate terms and conditions may also be applicable here); and
- through your other communications with us.

It is important that you read this privacy notice when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

This version of our privacy notice was last updated on 7/8/2020. We may amend this privacy notice from time to time.

4 **To whom does this privacy notice apply?**

This privacy notice applies to all individuals:

- who visit our Website.
- who are our "**client contacts**" where your organisation are or have been our corporate client (being a corporate entity such as a limited company or limited liability partnership).
- who are or were our "**individual clients**" where you are a sole trader, partner in a traditional or limited partnership or member of an unincorporated association.
- who are "**candidates**" for employment.
- who are our "**business contacts**" where you or your organisation supply goods or services to us, provide professional services, have expressed an interest in us or have any other business relationship with us (including where your organisation is a public authority, an industry body or regulatory authority or similar).

This privacy notice does not apply to employees, workers, or other staff of Global Talent 2020 Limited.

5 **Information about our Website**

Our Website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and we are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy notice of every website you visit.

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Website may become inaccessible or not function properly.

6 **Children**

Our Website is not intended for children and we do not knowingly collect any personal data relating to children.

7 What personal data do we collect and process?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity of the individual has been removed (**anonymous data**).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, image (where we communicate with you via a video conferencing platform) social media or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes home or work address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
- **Employment Data** includes job title and role and candidates' employment history.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Website.
- **Usage Data** includes information about your visit and how you use our Website.

We do not collect "**special categories of personal data**" such as information about your health unless you (candidates) inform us of any medical condition where it is needed to assess your working capacity on health grounds (subject to appropriate confidentiality safeguards). We do not collect any information regarding any criminal convictions.

We may collect, use and share "**Aggregated Data**" such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

8 Why do we process your personal data?

Candidates: We need to process your personal data throughout our relationship with you for recruitment purposes, positions with clients, health and safety, human resource requirements, regulatory requirements, and statutory reasons such as HMRC requirements.

Client contacts and individual clients: We need to process your personal data throughout our relationship with you (or your organisation) in order to manage our relationship with you as our client contact or individual client and in order to provide our services to your organisation including: (a) providing information about our services on request; (b) carrying out our services; (c) managing payments, fees and charges; (d) collecting and recovering money owed to us; (e) dealing with any client complaints and receiving feedback; or (f) corresponding with you in connection with our services.

Business contacts: We need to process your personal data throughout our relationship with you (or your organisation) in order to manage our business relationships with suppliers and sub-contractors, professional advisors, regulatory authorities, public authorities and others, which will include: (a) seeking or maintaining business relationships with various organisations, including accreditation and regulatory authorities; (b) assessing the suitability of any existing or potential supplier or other business relationship; (c) negotiating and entering into appropriate contracts for the supply of goods or services to us, carrying out any obligations under such contracts (including obligations of payment) and if necessary enforcing any such contracts; (d) undertaking on-going monitoring and management of our relationship with suppliers and other professional and business contacts; (e) interacting with other organisations (including partners or sub-contractors) in the course of providing services to our clients; or (f) investigating any complaints or enquiries.

Website users: We need to process your personal data while you visit or use our Website in order to respond to general and specific enquiries via our Website; to improve the user experience; and to administer the functionality and network security of our Website.

9 **How is your personal data obtained?**

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

- **Direct interactions.** You may give us your identity, contact, financial, transactional or similar personal data when you correspond with us by post, phone, e-mail or otherwise, including when you complete a form on our Website or otherwise contact us via our Website.
- **Direct interactions with business contacts and client contacts.** You may give us your identity, contact, financial, transactional, and other business-related personal data when you correspond with us, including when:
 - you or your organisation negotiate and/or enter into a contract with us; or
 - you or your organisation provide services or products to us or you or your organisation receive services from us; or
 - you provide us with your business card.
- **Direct interactions with candidates.** You may give us your identity, contact, employment, or other business-related personal data when you correspond

with us, including when you upload your CV on our Website or enter into a contract with us.

- **Automated technologies or interactions.** As you interact with our Website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - where you are a client contact or business contact, your organisation or business may provide us with your identity and contact data.
 - we may obtain identity and contact data from publicly available sources such as social media (such as LinkedIn or Twitter), Companies House or other organisations' websites.
 - we may obtain contact, financial and transaction data from providers of payment and credit card services.
 - we may obtain technical and usage data (relating to the use of our Website) from analytics providers or search information providers.

10 **Failure to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform services for you.

11 **Marketing**

If you are an individual client or a candidate, we will only provide you with direct marketing communications where you have consented to receive such communication or you have contacted us directly to request specific information about our services. You can subscribe to such marketing communications, and you can adjust your marketing preferences at any time by contacting us at **natalie@alleramarketing.com**.

If you represent another business, we may provide you with direct marketing communications where we feel that this may be relevant to your business (provided that you have not opted out of such communications). When we use your personal data for such purposes, we do so on the basis that it is in our legitimate interests to pursue direct marketing, provided that it constitutes fair processing of your personal data to do so.

You can also opt-out or unsubscribe from all or some of these marketing communications at any time by contacting us at **natalie@alleramarketing.com**.

Where you opt out of receiving these marketing communications, this opt-out will not apply to personal data provided to us for any other purpose.

12 **How will we use your personal data?**

Personal data may be processed by us where you consent to the processing or where that processing is necessary for 1) the performance of a contract with you and/or to provide services to you; or 2) compliance with a legal obligation to which we are subject; or 3) the purposes of our legitimate interests (or those of a third party).

Legitimate interests means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Where we process your special category personal data, this may be with your explicit consent or where that processing is 1) necessary to protect your vital interests or the vital interests of another natural person where you or such other natural person are physically or legally incapable of giving consent; or 2) in relation to a legal claim; or 3) in relation to personal data which you have made public; or 4) necessary for public interest reasons; or 5) in accordance with a condition in the Data Protection Act 2018 which allows us to undertake such processing.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground or grounds we are relying on to process your personal data.

Purpose/Activity	Type of data	Lawful basis for processing (including basis of legitimate interest)
Where you visit our Website	(a) Technical (b) Usage (c) Marketing and Communications	(a) Necessary for our legitimate interests (to maintain network security and Website relevance for visitors to our Website) (b) Necessary to comply with a legal obligation (c) With your consent where you subscribe to our newsletter or other marketing material through our Website
Where you are a candidate	(a) Identity (b) Contact (c) Employment	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to manage candidate

	<p>(d) Marketing and Communications</p> <p>(e) Special category personal data</p>	<p>relationships)</p> <p>(c) Necessary to comply with a legal obligation</p> <p>(d) With your consent where we provide marketing information to you</p> <p>(e) With your explicit consent in respect to special category personal data</p> <p>(f) Necessary to protect your vital interests</p> <p>(g) Where our processing is in accordance with a specific condition set out in the Data Protection Act 2018 (special category personal data)</p> <p>(h) Necessary to comply with a legal obligation</p>
<p>Where you are a sole trader, partner in a traditional or limited partnership, member of an unincorporated association</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Employment</p> <p>(d) Financial</p> <p>(e) Transaction</p> <p>(f) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us and to manage customer relationships)</p> <p>(c) Necessary to comply with a legal obligation</p> <p>(d) With your consent where we provide marketing information to you</p>
<p>Where you are a contact person of an existing or former corporate client</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Employment</p> <p>(d) Financial</p> <p>(e) Transaction</p> <p>(f) Marketing and Communications</p>	<p>(a) Performance of a contract with our corporate clients</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us and to manage customer relationships including marketing)</p> <p>(c) Necessary to comply with a legal obligation</p>

Where you are a business contact	(a) Identity (b) Contact (c) Employment (d) Financial (e) Transaction (f) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us and to manage our business relationships including marketing) (c) Necessary to comply with a legal obligation
To establish, exercise and defend our legal rights	All data	Necessary for our legitimate interests (in protecting our legal rights)

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at natalie@alleramarketing.com.

13 With whom do we share your personal data?

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

- Your business or organisation (client contacts, individual clients, and business contacts only), for the purpose of providing our services to your business or organisation or receiving products or services from your business or organisation.
- Our clients where you are a candidate for a position.
- Service providers acting as processors who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Any relevant accreditation body or trade association.
- Any relevant regulatory authority or law enforcement agency, including HM Revenue & Customs and courts or tribunals who require reporting of processing activities in certain circumstances.
- Our employees, agents, contractors and other third parties so we can provide our services to you.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses

or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party processor service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Any sharing of your personal data will only take place:

- to maintain network and information security.
- to provide our services.
- to protect and defend our legal rights.
- to prevent an unlawful or dishonest act.
- to pursue our commercial objectives where this does not override your rights and freedoms as a data subject.
- to develop and improve our services in order to remain competitive.
- with your consent; or
- where we need to comply with a legal obligation.

14 **International transfers**

We generally do not transfer your personal data out of the European Economic Area (**EEA**). However, whenever we are required to transfer your personal data out of the EEA (for example where a third party supplier is located outside of the EEA), we ensure a similar degree of protection is afforded to it by ensuring that appropriate safeguards are implemented, including any of the following:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the USA, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the European Union and the USA. For further details, see [European Commission: EU-US Privacy Shield](#).
- You have provided your explicit consent to the transfer of your personal data outside of the EEA.
- The transfer is necessary for the purposes of performing a contract between us and you (the data subject).

15 **Automated decision making and profiling**

We do not use automated decision-making (including profiling) to make any decisions which would produce a legal effect or similarly significantly affect a data subject.

16 **How long do we retain your personal data?**

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.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

For tax purposes, we retain basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers.

17 **Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and the Information Commissioner's Office of a breach where we are legally required to do so.

18 **Your rights**

18.1 Your personal data is protected by legal rights, which include your rights to:

- **Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, following your request.

- **Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: if you want us to establish the data's accuracy; where our use of the data is unlawful but you do not want us to erase it; where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party (data portability).** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time where we are relying on consent to process your personal data.** 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.

- 18.2 If you wish to exercise any of these rights, please contact us using the details above.
- 18.3 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- 18.4 You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- 18.5 We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.