



## **EU HR – CANDIDATE PRIVACY NOTICE**

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### **1. Background to this Candidate Privacy Notice**

This Candidate Privacy Notice (this “Privacy Notice”) applies to personal data related to your application and potential employment for the Company as referred to below. This Privacy Notice applies to all recruitment candidates in the course of application for employment in any of our EU offices.

The Company processes personal data in regards to processing your application for recruitment, and does so in accordance with all applicable laws including the EU General Data Protection Regulation (GDPR) and applicable national laws, as further described in this Privacy Notice.

It applies to personal data that the Company, like any employer, needs to run our business and manage our relationship with you, at all stages during the recruitment process. We process personal information for a range of purposes relating to general recruitment activities as well as the recruitment process and this may include your application, assessment, pre-employment screening, and your worker permissions.

This Privacy Notice sets out:

- Why we collect your personal information;
- What information is collected;
- How it is processed within the recruitment process;
- Who receives it; and
- Your legal rights to control its use.

If you become an employee, then we will inform you of other data processing necessary in connection with your employment.

The Company also processes personal data in connection with its online advertising business, however that activity is not covered by this Privacy Notice. If you have questions regarding how the Company processes data for that purpose, or want to manage your choices in relation to that type of data, please consult the Company’s specific Privacy Notice for that area here: <http://www.captify.co.uk/privacy-policy/>

### **2. Data Controller and Data Protection Officer Details**

The entity that decides on the purposes for which and ways in which personal data relating to you is processed is:

- Captify Technologies Limited, (registered in England with company number 07620174) if you apply to work in our UK offices;
- or
- Captify Media SARL (registered in Paris with company number 81799374400017) if you apply to work in our French or Spanish offices,

(as applicable, referred to as the “Company”)

For any personal data-related issues you can contact:

- (a) The Captify People Team; or
- (b) The Company’s Data Protection Officer at:

5 Langley Street  
London, WC2H 9JA, UK  
[privacy@captify.co.uk](mailto:privacy@captify.co.uk)

### **3. What types of personal data does the Company process?**

This Privacy Notice covers the Company’s processing of “personal data”, which is defined as follows:

‘Personal data’ - means any information relating to you (or any other identified or identifiable person ), which may include name, address, telephone numbers (including mobile phone number), education, experience and qualifications, household, tax and social security information, and details of or any change in your personal circumstances which affects, or may affect, your tax status or right to work in in the role for which you are applying.

'Special categories of personal data' - means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; genetic data or biometric data (for the purpose of uniquely identifying a person); data concerning health; or data concerning a person's sex life or sexual orientation. This data will only be processed for certain narrowly defined purposes.

The personal data the Company may hold includes:

- a) Your CV, application letter, tests, samples, or application forms

- b) References
- c) Records relating to your employment history, such as training, appraisals, other performance measures and, where appropriate, disciplinary and grievance records;
- d) Correspondence with or about you, for example offer letters;
- e) Data regarding past, desired and possible compensation: basic salary, benefits, bonuses, etc.;
- f) Contact and emergency contact details;
- g) Personal data needed for any equal opportunities monitoring policies;
- h) Criminal convictions data: the Company does not currently process such data and would do so only where this is expressly permitted or required by the law and in accordance with all applicable restrictions
- i) CCTV Images and video footage of what takes place at our office locations (e.g. when you attend an interview), at all times of day, in real time.

We operate CCTV cameras within our office in clearly signed locations. Footage is recorded for the purposes of maintaining the health and safety of employees and preventing crime and theft of property.

CCTV footage from these cameras is generally held for a maximum of 30 days from the time of recording. The data is stored by Nest (a division of Google LLC <https://nest.com/uk/privacy/>) who may be contacted at [privacy@nest.com](mailto:privacy@nest.com)

Access to footage is administered by the Company's CFO, Head of People and CTO (in the case of technical fix requirements);

- j) Nationality / visa / right to work permit information; (e.g. passport, driving licence, National Insurance numbers);
- k) Special categories of personal data:

**Health:** Where necessary, we may keep personal data relating to your health or medical conditions. This personal data will be used in order to comply with our health and safety and occupational health obligations – to consider how your health affects your ability to do your job and whether any adjustments to your tasks or the workplace might be appropriate.

The only other times we would process special categories of personal data are where this information is:

- Necessary for compliance with laws or carrying out employment-related rights and obligations;
- Required to protect your health or safety in an emergency;
- Something that you have made publicly available.

Much of the personal data we hold will have been provided by you, but some may come from other external sources, such as referees or doctors.

#### **4. Why does the Company need to collect and process this personal data?**

The Company keeps and processes personal data relating to you in order to:

- manage and process your application and for general recruitment purposes, on the basis that it is in the legitimate interests of the Company to do so;
- comply with applicable laws or regulations;
- in the case of special categories of information (as per the detail in section 3) where we have obtained your explicit consent or where permitted by applicable laws.

#### **5. Who receives your personal data?**

We may transfer personal data about you to other Company offices for purposes connected with your recruitment application or the management of the Company's business. At the date of this Privacy Notice, the Company has offices and staff in London, Manchester, Paris, Madrid, New York (USA) and Kiev (Ukraine).

We may use third party data processors to manage personal data in connection with our recruitment processes, who may be located within the EU (as well as Switzerland, and Norway, Iceland and Liechtenstein where personal data protection rules apply very similar to those in the EU) or elsewhere. Whenever your data is transferred to other places, we have in place safeguards to ensure the security of your data which may include:

- A decision from the European Commission that such places have adequate laws to protect your data;
- Where applicable the EU-US Privacy Shield for transfers to business partners in the US; and
- European Commission approved standard contract clauses for other transfers.

Where this is required by law, we will provide a copy of the safeguards applicable to your personal data, if requested.

At our discretion, we may disclose CCTV footage and/or personal data in response to valid requests from the police and other statutory law enforcement agencies or if otherwise

required by law.

## **6. How long do we keep your personal data?**

Your personal data will be stored only for as long as it is needed for the purpose for which it was obtained.

In any event, we need to keep data as follows:

- a) For job applicants and candidates: not more than six months after the role has been filled (unless you ask or authorise us to keep it for longer)
- b) For CCTV footage, no longer than 30 days.

## **7. What are your rights?**

You have a number of rights with regard to your personal data, i.e.:

- To ask for access to it;
- To ask for errors in it to be corrected;
- To ask for it to be erased (the “right to be forgotten”);
- If not erased (e.g. if it is required to be kept for legal reasons), then to ask us to restrict its processing;
- To object to its processing for specific purposes;
- To ask for a copy to take (or have us provide) to another data controller. Please note that this would relate only to information provided by you – information the Company has received from others or created internally would not be covered.

We are not usually required to ask for your consent for the processing of personal data, as it is necessary for the reasons set out in this Privacy Notice. However, where we do rely on any consent that you have given, then you are always allowed to withdraw your consent at any time (though the processing that took place before withdrawal will still be legal).

In certain circumstances it may not be possible for these rights to be exercised in full or at all as they are closely related to your application or applicable employment laws. We will explain any actions we have taken or not taken in relation to any request you make.

We are always available through the contacts in Section 2 above to help resolve any issues or doubts you may have in relation to processing of your personal data. If you believe that your rights have not been respected at any time then you also have a right to complain to the Supervisory Authority in your country (in the UK, the Information Commissioner’s Office – “ICO”; in France, the Commission nationale de l’informatique et des libertés – “CNIL”; in Spain, the Agencia Española de Protección de Datos – “AEPD”) to ask them for a resolution.

## **8. Consequences of not providing (or updating) data**

Other than where we have asked for your consent for data processing, processing of personal data is necessary for the reasons set out in this Privacy Notice. If you wish to object

to processing of personal data relating to you, or require us to delete it, this could lead to us being unable to comply with the application process or other legal obligations. If so we will tell you about the potential effects of our not having the proper data in those circumstances.

Last updated: 17th August 2018