

CANDIDATES

Notice on the processing of personal data pursuant to Regulation EU No 2016/679 (the "Regulation")

Dear Candidate,

Citifocus Ltd hereby informs you that your personal data will be processed in accordance with the Regulation and in compliance with the notice set forth below.

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1. Personal data controller

The data controller is the company Citifocus Ltd (hereinafter the "**Controller**" or the "**Company**"), with registered office at Warwick House, 65-66 Queen Street, London EC4R 1EB (UK), e-mail: info@citifocus.co.uk.

2. Object of the processing

The processing may concern the following personal data: forename and surname, date and place of birth, domicile, telephone and mobile number, e-mail address, information on profession, qualifications, linguistic skills, education, possibly your image, and any other data featured on your CV (including photos).

We hereby inform you that, during the candidacy assessment phase, we do not need to process special data, i.e. personal data that reveal racial or ethnic origin, religious or philosophical beliefs, political opinions, trade union membership, genetic data, biometric data, data concerning health or sex life or sexual orientation, nor data concerning criminal convictions or offences.

For this reason, we ask you only to provide the data necessary for assessing your candidacy and to refrain from including data that is not relevant for the selection process.

However, should you find it helpful or necessary to provide some of these special data to improve the assessment of your candidacy (e.g. membership of protected categories, in the event of unsolicited applications or following an announcement that expressly stipulates this requirement), we wish to inform you that you must grant your consent to the processing thereof.

3. Cookies

We hereby inform you that we may collect data concerning your visits to our website (including, but not limited to, your IP address, browser type, location from which you visited our site), chiefly in order to simplify your future visits and improve your user experience.

For more details concerning the cookies used, please read our cookie policy here:

<https://www.citifocus.co.uk/jobboard/cands/cookie-policy.asp>.

4. Data security

Your data will be processed using both electronic and manual tools (paper documentation) and protected with suitable security measures that ensure their confidentiality and integrity.

We follow rigorous security procedures in the storage and disclosure of personal data, to ensure protection against accidental loss, destruction or damage.

We may disclose your information to the third parties referred to in paragraph 7 for the purposes indicated in paragraph 5 of this Notice. We require all third parties to adopt adequate technical and operating security measures, to protect personal data. Such measures must be in line with EU data protection legislation.

Should you have any suspicions of improper use or loss or unauthorised access of your personal data, you should notify us immediately by sending an e-mail to the Data Protection Officer at the address indicated in paragraph 11.

5. Purposes and legal basis of the processing

Your personal data will be processed for:

- a) purposes connected with the management of your candidacy and the search and selection of staff to employ at our Company, group companies (subsidiaries or associated companies) or client companies, including on supply contracts. This may include: entering your data into our databases; sending your data to potential employers ('long lists' and 'profile', containing non-identification data: candidate's age; place of domicile; qualifications; professional experience; abilities and skills); requesting references from any previous employers (as shown on your CV, provided that you are not still under contract with them); collecting your data from other sources, e.g. LinkedIn; sending questionnaires when you access the personal area of our website, e.g. on language skills or the possibility of conducting optional aptitude tests through our platform (in relation to which you will receive suitable information); carrying out training courses in the cases of candidates for a work assignment. The legal basis of the processing is the performance of the contract or pre-contractual measures (Article 6(1)(b) of the Regulation);
- b) to satisfy any legal or regulatory obligations. The legal basis is in compliance with legal obligations (Article 6(1)(c) of the Regulation);
- c) marketing purposes, i.e. the sending, by our company, of promotional information and communications, by e-mail or SMS, telephone calls with an operator or mail, concerning services or offers, as well as notifications of events, including networking, organised by the Company, group companies or commercial partners. The legal basis for this purpose is consent (Article 6(1)(a) of the Regulation);
- d) your data, such as audio and video images, acquired through the recording of interview videos through the Citifocus portal, will be used to enable a better assessment of your candidacy, in order to send your profile to potentially interested clients, formulate offers and promote your candidacy to other client and potential client companies. The legal basis for the processing is consent (Article 6(1)(a) of the Regulation).

We may use your personal data where necessary for the pursuit of our legitimate interests without needing to obtain your consent, pursuant to and in accordance with the conditions laid down in Article 6(1)(f) of the Regulation (e.g. fraud prevention, transmission of data within the business group).

6. Submission of data and consequences in the event of refusal of consent

The submission of data for the purposes indicated in letters a) and b) of the previous paragraph is mandatory for the search and selection activities and failure to do so will make it impossible for us to provide our services and establish any relationship with you. Should you have also supplied any special data, considered necessary for a better assessment of your candidacy, the granting of consent is mandatory, and we will not be able to take them into consideration should it be withheld.

The submission of data for the purposes indicated in letters c) and d) is optional and may be modified at any time. Any failure to submit such data will make it impossible for us to keep you updated of new events or offers (letter c) or promote your candidacy using the video interview method (letter d).

7. Recipients of data

The data may be made accessible, brought to the attention of or in any way disclosed to the following parties:

- employees and/or any agents of the Controller, who have been adequately instructed and authorised for such processing;
- Companies within the group of which the Controller is a member (subsidiaries and associated companies), who handle recruitment for purposes relating to the conducting of search and selection activities and for internal administrative ends;
- Parties, natural or legal persons, called upon by the Controller for the conducting of activities necessary for achieving the purposes indicated above (including, but not limited to: IT and applications service providers, as the managers of candidacies and e-mail marketing platforms; website operators, etc.), all of whom shall be appointed Data Processors;
- Parties, whether public or private, natural or legal persons, to whom the Controller is required to disclose the data under legal or regulatory obligations;
- Our client companies/potential employers/user companies, your previous employers, exclusively within the context of the search and selection and management of candidacies, and therefore for the purposes indicated in letters a) and d) of paragraph 5. These parties will process the data as independent data controllers.

Your personal data will not be made public.

8. Transfer of data outside the European Union

Our Company also operates overseas. You can view a list of the countries in which we have a presence at the following link: <https://www.citifocus.co.uk/contact-us.asp>.

As indicated in the previous paragraph, we may share your data with group Companies located outside the European Union for purposes relating to the conducting of search and selection activities, as well as for internal administrative ends (the legal basis for such sharing are performance of the contract or pre-contractual measures and the legitimate interest of the Controller in transmitting the data within the business group).

Moreover, in carrying out its ordinary activities, our Company may call on certain suppliers, who operate outside the European Union.

We wish to make it clear that, in any hypothesis of transfer outside the European Union, the guarantees envisaged in articles 44 et seq. of the Regulation shall be adopted.

In particular, should there be no adequacy decision (Article 45 of the Regulation), our Company has prepared contractual instruments containing the standard contractual clauses approved by the European Commission which offer protection for personal information transferred to non-European Union countries (Article 46 of the Regulation).

You may request more information about the contractual clauses in use and/or a list of suppliers, who operate abroad from our Data Protection Officer at the address indicated in paragraph 11.

9. Data retention period

Your personal data will be kept for a period of 24 (twenty-four) months from online registration or from your final activity (e.g. accessing your personal area, updating or uploading a CV) for the purposes referred to in letters a), c) and d) of paragraph 5.

Should you find employment through our services or participate in active employment policies, the Company will keep your data for a longer period (up to a maximum of 10 years from the end of the relationship, in any event), in compliance with any legal or contractual obligations in force.

Any data processed for the purpose of legitimate interest will be kept for the time strictly necessary for achieving that purpose, in accordance with the principles of data minimisation and storage limitation.

10. Rights of the data subject

We wish to inform you that you may exercise the following rights:

- To obtain confirmation as to whether or not personal data concerning you are being processed;
- Where that is the case, to obtain access to the personal data and information concerning the processing, as well as to request a copy of the personal data;
- To obtain the rectification of inaccurate personal data and to have incomplete personal data completed;
- To obtain, where one of the grounds laid down in Article 17 of the Regulation applies, the erasure of personal data concerning you;
- To obtain, in the cases stipulated in Article 18 of the Regulation, restriction of processing;
- To withdraw your consent at any time to the processing of data for the purposes for which such consent was sought. (The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal);
- To receive the personal data concerning you in a structured, commonly used and machine-readable format and to request that they be transmitted to another controller, where technically feasible;
- To object to the processing of your personal data where a personal (or third-party) legitimate interest is invoked and where there are elements pertaining to a specific personal situation, which leads you to object to the processing. You also have the right to object to the processing where your personal information is used for direct marketing purposes.
- To lodge a complaint with the Personal Data Protection Authority if you consider that your rights have been infringed, according to the procedures indicated on the website of the Authority: ico.org.uk.

If you wish to exercise one of these rights, please contact our Data Protection Officer, using the contact details provided in paragraph 11 below.

You shall not incur any cost for accessing your personal information (or for exercising one of the other rights).

However, if the request for access is clearly unfounded or excessive, we may charge you a reasonable sum.

Alternatively, we may refuse to grant your request in such circumstances.

We may need to ask you for specific information, which will help us to confirm your identity and guarantee your right to access information (or exercise any of the other rights). This is a further security measure aimed at ensuring that personal information is not disclosed to persons who are not entitled to receive it.

11. Data protection officer

The Data Protection Officer, appointed by the Controller, may be contacted by:

- mail addressed to: Warwick House, 65-66 Queen Street, London EC4R 1EB, FAO The Data protection officer;
- e-mail to: dpo@injob.com.

12. Amendments to the notice

Our Notice on the processing of personal data may be modified from time to time. We therefore invite you to consult our website periodically to view the latest updated version.

Place and Date,.....

Signature to mark acknowledgement.....