

This privacy statement explains how your personal data is handled by Sword Group during the application and contractor management processes. For Privacy policies in relation to our websites and where you submit information through our website, please see the “Privacy Policy”.

Aberdeen Appointments Agency (AAA), a subsidiary of Sword Group will collect personal information through email communications, telephone calls, social media, and/or job boards. Aberdeen Appointments Agency collects and processes personal data for the purposes of providing you with work findings services and/or information relating to roles relevant to you. The personal information collected by Aberdeen Appointments Agency will be processed in accordance with this policy.

Aberdeen Appointments Agency will collect your personal data (which may include special categories of personal data) and will process your personal data for the purposes of providing you with work-finding services. This may include, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities, arranging payments to you and developing and managing our services and relationship with you and our clients.

On some occasions we may be required to use your data for the purpose of investigating, reporting and detecting crime and also to comply with laws that apply to us. We may also use your information during the course of internal audits to demonstrate our compliance with certain industry standards.

We must have a legal basis to process your personal data. The legal bases we rely upon to offer our work-finding services to you are:

- Legitimate interest
- To comply with a legal obligation that we have
- To fulfil a contractual obligation that we have with you

Legitimate interest

Aberdeen Appointments Agency relies on Legitimate Interest as the company has a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect from us. Where the Company has relied on a legitimate interest to process your personal data our legitimate interests are as follows:

- Managing our database and keeping work-seeker records up to date;
- Providing work-finding services to you and our clients;
- Contacting you to seek your consent where we need it;
- Giving you information about similar services to those that you will have used from us recently;

However, if you wish for Aberdeen Appointments Agency to halt the processing and retention of your personal data, you can do so by contacting privacy@sword-group.com with your request for your information to be removed, this will be done in compliance with local legislation and contractual arrangements.

Statutory/contractual requirement

Aberdeen Appointments Agency has certain legal and contractual requirements to collect personal data (e.g. to comply with the Conduct of Employment Agencies and Employment Businesses Regulations 2003, immigration and tax legislation, and in some circumstances safeguarding requirements). Our clients may require this personal data, and we may need your data to enter into a contract with you. If you do not give us the personal data we need to collect In order to comply with our statutory and legal requirements, we may not be able to continue to provide work-finding services to you.

Recipient/s of data

Aberdeen Appointments Agency will process your personal data and/or sensitive personal data with the following recipients:

- Clients (who we may introduce or supply you to)
- Your former employers who we may seek references from
- Payroll service providers who manage payroll on our behalf or other payment intermediaries who we may introduce you to
- Auditors who are assessing the compliance and processes of the business to ensure its adherence to all relevant legislation and good practice guidance

Information we may collect and process

The Company has collected the following personal data on you:

Personal data:

- Name
- Address
- Mobile number
- Email address
- National insurance number
- Nationality (through right to work check)

Special categories of personal data:

- Health information as appropriate
- Criminal conviction(s)

Aberdeen Appointments Agency source your personal data/special categories of personal data:

- Jobs boards, LinkedIn
- A former employer
- A referee whose details you previously provided to us

Overseas Transfers of Information

The Company will not transfer the information you provide to us to countries outside the UK and/or

the European Economic Area ('EEA') for the purposes of providing you with work-finding services.

The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

Data retention

Aberdeen Appointments Agency will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time. For example, the Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services. We are required to keep your records relating to the right to work in the UK 2 years

after employment or the engagement has ended alterable and working time records including your 48 hour opt out notice annual leave/holiday records 2 years from the time they were created.

Additionally, we must also keep your payroll records, holiday pay, sick pay and pensions autoenrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation. This is currently 3 to 6 years.

Aberdeen Appointments Agency shall keep personal data for a period of 2 years after the engagement.

Your rights

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

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

If you wish for Aberdeen Appointments Agency to halt the processing and retention of your personal data, you can do so by contacting privacy@sword-group.com with your request for your information to be removed, this will be done in compliance with local legislation and contractual arrangements. Please note that if you withdraw your consent to further processing that does not affect any processing done prior to the withdrawal of that consent, or which is done according to another legal basis.

There may be circumstances where the Aberdeen Appointments Agency will still need to process your data for legal or official reasons. Where this is the case, we will tell you and we will restrict the data to only what is necessary for those specific reasons.

If you believe that any of your data that Aberdeen Appointments Agency processes is incorrect or incomplete, please contact us using the details above and we will take reasonable steps to check its accuracy and correct it where necessary.

You can also contact us using the above details if you want us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.

Links to external websites

The Company's website may contain 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.

Sale of business

If the Company's business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business. Where the sale of the business results in the transfer of your details to a different data controller we will notify you of this.

Data Security

Aberdeen Appointments Agency takes every precaution to protect users' information in accordance with the ISO 27001 Information Security Management System.

Only employees who need the information to perform a specific job are granted access to your information.

The Company uses all reasonable efforts to safeguard your personal information. However, you should be aware that the use of email/the Internet is not entirely secure and for this reason the Company cannot guarantee the security or integrity of any personal information which is transferred from you or to you via email/the Internet.

Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: privacy@sword-group.com.

You also have the right to raise concerns with the Information Commissioner's Office on [0303 123 1113](tel:03031231113) or at <https://ico.org.uk/make-a-complaint/>, or any other relevant authority should your

personal data be processed outside of the UK and you believe that your data protection rights have not been adhered to.