



PRIVACY POLICY

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INTRODUCTION

This Privacy Policy explains what we do with your personal data, whether we are in the process of introducing ourselves to you, helping you to find a job, continuing our relationship with you once we have found you a role, performing a service for you, or you are visiting our website.

It describes how we collect, use and process personal data, and how, in doing so, we comply with our legal obligations to you.

Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

We may amend this Privacy Policy from time to time. This Privacy Policy applies in relevant countries throughout our network. It is important to note that different countries may approach data privacy in slightly different ways.

1. The data we collect

- **CANDIDATE DATA:** In order to provide the best possible employment opportunities that are tailored to you, we need to access and process certain information about you – this information is predominantly what is publicly available on platforms such as LinkedIn and Indeed, and otherwise is augmented from our interactions with you and information you send us such as your CV, immigration status and remuneration expectations.
- **PROSPECTIVE CANDIDATE DATA:** If we think you might be interested in, or might benefit from, our services, we will collect and use such information about you to assess how we might be able to help you out and to get in touch.
- **CLIENT DATA:** If you are a Blue Astral Client, we need to collect and use information about you, or individuals at your organisation, while providing you or offering you services such as: (i) finding and introducing candidates who are the right fit for you or your organisation; (ii) providing you with talent advisory consulting services; (iii) providing services to your employees, such as interview training.
- **WEBSITE VISITORS:** If you have applied for a position advertised on our website, we will collect and use the data you submit to us including your name, email address, CV and marketing preferences. If you contacted us via our website but unrelated to a specific position, we will have collected your name and email address. To the extent that you access our website or click through any links in an email from us, we currently do not track this behaviour and do not use Cookies.

2. How we collect your data

- **CANDIDATE DATA:** We collect your personal data either directly from you, or from third parties where your information is freely and publicly available such as LinkedIn and Indeed.
- **PROSPECTIVE CANDIDATE DATA:** We collect your personal data from third parties or from you where you have provided your CV in response to a specific position, or prospectively, via our website.



- **CLIENT DATA:** We collect your personal data either directly from you, or from third parties where your information is freely and publicly available
- **WEBSITE VISITORS:** We collect the data you submit via our website

3. How we use your data

- **CANDIDATE DATA:** The main reason for using your personal details is to help you find employment or other work roles that might be suitable for you. The more information we have about you, your skillset and your ambitions, the more bespoke we can make our service. In most cases, the information we hold about you will be information you have sent to us or told us in person. Where appropriate and in accordance with local laws and requirements, we will also use your personal data for things like marketing our services to you, profiling, and diversity monitoring. Where appropriate, we will seek your consent to undertake some of these activities.
- **PROSPECTIVE CANDIDATE DATA:** We use Prospective Candidate information to work out whether you might be interested in, or might benefit from, our services, and if so, to assess whether and how we may be able to help you out. If we think we can help you, we will use your information to get in touch with you about our services.
- **CLIENT DATA:** The main reason for using information about Clients is to enable us to introduce ourselves to you and to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly. This will involve: (i) identifying candidates who we think will be the right fit for you or your organisation; (ii) providing you with talent advisory services, including but not limited to workforce planning, recruitment process design, diversity & inclusion strategy & policy, career path planning, succession planning; (iii) providing services to your employees, such as interview training. The more information we have, the more bespoke we can make our service.
- **WEBSITE VISITOR DATA:** Where you have applied for a specific position via our website, or via the 'Contact' or 'Get in Touch' forms on our website, we will process your data in the same way as we would candidates and prospective candidates.

4. Who we share your personal data with

- **CANDIDATE DATA:** Primarily we will share your information within the Blue Astral team and with prospective employers, and / or their approved third-party contractors, to increase your chances of securing the job you want.
- If you would like to see a more detailed list of who we might share your personal data with, in appropriate circumstances, please contact us at info@blueastral.co.uk.
- **PROSPECTIVE CANDIDATE DATA:** Where we have identified you as a Prospective Candidate, we may share your information between our team and with our clients by way of reaching a shared understanding of the type of candidate profile we or they should be considering for a particular role
- **CLIENT DATA:** We will share your data amongst ourselves and with candidates and prospective candidates: (i) primarily to ensure that we provide you with a suitable pool of candidates; (ii) to provide you with talent advisory services; (iii) to provide services to your employees, such as interview training.
- **WEBSITE VISITORS:** We do not share your data with anyone else.

5. How we safeguard your personal data

- We care about protecting your information. That's why we only use rigorously vetted, cloud-based systems to store your data, and put in place appropriate operational processes that are designed to prevent unauthorised access to, and misuse of, your personal data.

6. How long we keep your personal data

- **CANDIDATE & PROSPECTIVE CANDIDATE DATA:** We will retain your data during the period over which there is legitimate interest and / or we are having meaningful contact with you, and for a period of three years thereafter.
- If we have not had meaningful contact with you (or, where appropriate, the company you are working for or with) for a period of three years, we will delete your personal data from our systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation).
- If you have expressly indicated that you're not interested in our services, then we will delete your personal data from our systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation) or other legal exceptions apply.
- **CLIENT DATA:** We will retain your personal data in order to provide you with services, or to provide you with information about our services that we believe you may be interested in. If you have expressly indicated, in writing, that you do not want us to retain your personal data, we will delete it from our Systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation) or other legal exceptions apply.
- **WEBSITE VISITOR DATA:** To the extent that you apply for a position or contact us via our website, we will treat your data the same as with any candidate or prospective candidate.

7. Accessing, amending or requesting deletion of your personal data

- You have various rights in relation to your personal data if held and processed by us.
- **Right to object:** If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. Please raise your objection in writing to info@blueastral.co.uk. We aim to respond to your request within 30 days although we may be allowed to extend this period in certain cases. Generally, we will only disagree with you if certain limited conditions apply.
- **Right to withdraw consent:** Where we have obtained your consent to process your personal data for certain activities (for example to use cookies) or consent to market to you, you may withdraw your consent at any time. You can update your Cookie preferences on your personal device(s). To remove your consent for us to market to you, you can click the **unsubscribe** option present on our email marketing communications or email us at info@blueastral.co.uk.
- **Data Subject Access Requests (DSAR):** You have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or delete such information. To submit any such request, please write to us at info@blueastral.co.uk. We aim to respond to your request within 60 days, at which point we may comply with your request or do one of the following:
 - ask you to verify your identity, or ask for more information about your request; and
 - decline your request where we are legally permitted to do so (we will explain why if we do so).
- **Right to erasure:** In certain situations (for example, where we have processed your data unlawfully, or the period of legitimate interest is agreed, by both you and Blue Astral, to have expired), you have the right to request us to "delete" your personal data. You should make this request in writing to info@blueastral.co.uk. We will

respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply.

- **Right of data portability:** If you wish, you have the right to transfer your data from us to another data controller. Should we receive a written request from you to do this, we aim to respond within 30 days. Firstly, we will seek proof of who you are and once satisfied your request is legitimate, we will directly transfer your data for you or, by agreement, provide you with a copy in a commonly used format.
- Please note that, where necessary, we will keep a record of your communications regarding any of the points above, to help us resolve any issues which you raise.

8. How and where we store and transfer your data

8.1 Recruitment & Client Service Activities

- Your personal data is held within Blue Astral's privately licenced versions of three core systems which we use for our day-to-day recruitment and client service activities:
 - o PC Recruiter
 - o LinkedIn Recruiter
 - o G-Suite
- Each of these systems are password protected and Blue Astral employees are only permitted to access these systems on pre-approved devices.
- The three core systems are used as follows:
 - o PC Recruiter: (i) hold candidate details and resumes; (ii) track candidate progress against specific roles; (iii) hold details about clients; (iv) hold details about specific roles; (v) reporting
 - o LinkedIn Recruiter: (i) identify prospective candidates; (ii) contact candidates and prospective candidates; (iii) track candidates against specific clients and roles
 - o G-Suite: (i) Blue Astral email; (ii) Blue Astral calendars; (iii) Blue Astral document creation; (iv) Blue Astral document & report storage (shared and private drives for each employee). Note that access to shared folders is restricted on a need-to-know basis, dependent on each employee's role.
- Data is typically transferred as follows:
 - o LinkedIn to PC Recruiter: use of PCR Capture widget or manual data entry by Blue Astral employees
 - o LinkedIn to G-Suite: download or manual data entry by Blue Astral employees
 - o G-Suite to PC Recruiter: upload or manual data entry by Blue Astral employees
 - o PC Recruiter to G-Suite: download
- Privacy policies for the three systems can be found on their respective websites. Use of the systems under Blue Astral's private licences are subject to the data management terms of this Privacy Policy.

8.2 Marketing Activities

- If you have signed up to our Newsletter, we will store your name and email address in Active Campaign, our CRM system to ensure the timely receipt of our published content. No other data is held in Active Campaign. Should you unsubscribe from our Newsletter at any time, a flag will be applied to your email address so that it is removed from subsequent marketing emails.



- We will periodically send you information that we think you may find interesting, or to ask for your help with connecting other candidates with jobs. In particular, we will use your data for the purposes listed below, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive. To:
 - enable us to develop and market other products and services;
 - market our full range of recruitment services (permanent, temporary, contract, outplacement) to you;
 - send you details of reports, promotions, offers, networking and client events, and general information about the industry sectors which we think might be of interest to you;
 - display promotional excerpts from your details on the Blue Astral website as a success story (only where we have obtained your express consent to do so); and
 - provide you with information about certain discounts and offers that you are eligible for by virtue of your relationship with Blue Astral.
- Where we cannot rely on the legitimate interest condition, or soft opt-in consent, we will directly ask you to opt-in. Soft opt-in consent is a specific type of consent which applies where we have obtained your contact details from an occasion when you previously engaged with us (for example by submitting a job application or CV, or registering a vacancy to be filled), and we are e-marketing other recruitment-related services of our own. Under 'soft opt-in' consent, we will take your consent as given unless or until you object or opt out (and we will remind you of your right to do this and provide you with the opportunity to opt-out, in each e-marketing message that we send to you). For most people, this is beneficial as it allows us to provide you with information that we think will be of interest to you and suggest other jobs to you alongside the specific one you applied for, significantly increasing the likelihood of us finding you a new position. We will use your personal data to send you e-marketing materials with your 'soft opt-in' consent if we deem that it is in our legitimate interests to do so.
- We want to let you know that even if you have opted out from our marketing communications through our preference centre, it is possible that your details may be recaptured through public sources in an unconnected marketing campaign. We will try to make sure this doesn't happen, but if it does, we're sorry. We'd just ask that in those circumstances you opt out again.