

Privacy policy

Privacy Policy for Employees and Workers (EEA, excluding the UK) ("Privacy Policy")

Right to Object: You have a legal right to object at any time to processing of your personal information which is based on our legitimate interests, unless there are compelling legitimate grounds for our continued processing.

Your employing [company](#) ("Your Employer" or "we") is committed to protecting the privacy and security of your personal information.

This Privacy Policy describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the EU General Data Protection Regulation 2016/679 ("**GDPR**") and national laws implementing GDPR. It applies to all employees, workers and contractors.

Your Employer is a "controller" of your personal data. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this Privacy Policy. Our contact details are set out in the Contact section at the end of this Privacy Policy, should you have any questions about the information provided in this Privacy Policy.

This Privacy Policy applies to current and former employees, workers and contractors. This Privacy Policy does not form any part of any contract of employment or other contract to provide services. We may update this Privacy Policy at any time.

It is important that you read this Privacy Policy, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal

information about you, so that you are aware of how and why we are using such information.

The Information we collect

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 has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.¹

The categories of personal information about you we collect, store and use are detailed in the "Privacy policy: The Information we collect document" .

How we collect your personal information

We collect personal information about employees, workers and contactors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or, where permitted by law, background check provider. We may also collect information from dependants or family members of our staff, for example in relation to emergency contacts or in relation to certain employment benefits. We may sometimes collect additional information from third parties where permitted by law including former employers, credit reference agencies or other background check agencies.

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

¹ This does not apply to all countries, and special categories of personal data will only be captured in countries where it is legally permissible to do so.

How we use your personal information

The Legal Basis for Processing your Personal Information

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information on the basis of the following lawful grounds under GDPR:

(a) **where it is necessary for entering into or performing a contract** – in order to process your job application or perform obligations which arise under the contract we have entered into with you, it will be necessary for us to process your personal data;

(b) **where we need to comply with a legal obligation** – we are subject to certain legal requirements which may require us to process your personal data. For example, we are required to maintain information about payments made to you, or about a pension we have set up for you with a pension provider. We may also be obliged by law to disclose your personal data to a regulatory body or law enforcement agency;

(c) **where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests** - either we, or a third party, will need to process your personal data for the purposes of our (or a third party's) legitimate interests, provided we have established that those interests are not overridden by your rights and freedoms, including your right to have your personal data protected. Our legitimate interests include our maintaining smooth operations , managing and protecting our personnel and protecting our assets;

(d) **Consent** – in limited circumstances, we may ask for your consent to process your personal data in a particular way.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest.

Situations in which we will use your personal information

We need all the categories of information listed [above](#) primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

The primary situations in which we will process your personal information are listed below:

- Making a decision about your recruitment or appointment
- Determining the terms on which you work for us
- Checking you are legally entitled to work in the country where you are employed
- Paying you and, if you are an employee, deducting tax and Social Security or similar contributions
- Providing employee benefits to you
- Liaising with your pension and benefits providers
- Administering the contract we have entered into with you
- Business management and planning, including accounting and auditing
- Conducting performance reviews, managing performance and determining performance requirements
- Making decisions about salary reviews and compensation
- Assessing qualifications for a particular job or task, including decisions about promotions
- Training records
- Gathering evidence for possible grievance or disciplinary hearings
- Making decisions about your continued employment or engagement

- Making arrangements for the termination of our working relationship
- Education, training and development requirements
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work and disciplinary or grievance matters
- Ascertaining your fitness to work
- Managing sickness absence
- Complying with health and safety obligations
- To prevent fraud
- To monitor your use of our information and communication systems to ensure compliance with our IT policies, identify security events and operate our security incident management procedures
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution
- To conduct data analytics studies to review and better understand employee retention and attrition rates
- Equal opportunities monitoring in countries where it is permissible or mandatory to do so

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information. You will appreciate that the above list cannot be exhaustive, but is intended to cover the main scenarios in which we process your information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

Change of purpose

We will only use your personal information 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.

Please note that we may process your personal information without your knowledge, in compliance with the above rules, where this is required or permitted by law.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations or exercise rights in connection with employment.
3. Where it is needed in the public interest, such as for equal opportunities monitoring.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

If we do ask for consent, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether

you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Our obligations as Your Employer

We will use your particularly sensitive personal information where this is required or permitted by law in the following primary ways:

- We will use information relating to leaves of absence, which may include sickness absence or family related leave, to comply with employment and other laws.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.
- We will use particularly sensitive information to ensure meaningful equal opportunity monitoring and reporting.
- Where we perform background checks, including right of employment, we will use information about you to support this process.²

Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. It is specifically regulated under GDPR where such decisions are taken which have legal or other significant effects on individuals. It is permitted in the following circumstances:

1. Where it is necessary to enter into or perform our contract with you and appropriate measures are in place to safeguard your rights.

² This does not apply to all countries, and equal opportunity monitoring and reporting and checks will only be undertaken in countries where it is legally permissible to do so

2. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated processing, unless we have a lawful basis for doing so, we have notified you and given you a right to challenge the decision or to require that the decision be taken by a person.

How we share your Personal Information

In certain circumstances we may need to share your personal information with third parties, including third-party service providers and other entities within the same group. Details of those third parties are set out below along with the reasons for sharing it.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

Why we might share your personal information with third parties

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Other PageGroup plc Group Companies within the EEA

We will share your personal information with other PageGroup plc Group Companies in the European Economic Area (including the UK) ("**EEA**"). A list of all these Companies offices can be accessed [here](#)

We will share your personal information as above for any or all of the following purposes:

- as part of our regular reporting activities on company performance;
- in the context of a business reorganisation or group restructuring exercise;
- for system maintenance support and hosting of data;
- for the conduct of centralised functions which support the operations of all Group companies in the EEA, including from the Shared Service Centre in Barcelona.

PageGroup plc Group Companies outside the EEA

We will pass your personal information to, or allow access to such information by, other PageGroup plc Group Companies worldwide where we have lawful grounds to do so. For example, as a result of the safeguards we apply, it will be within our legitimate interests to carry out intra-group transfers of data. The purposes for which we will do so include the performance of our global IT support function, which enables us to provide 24/7 coverage.

A list of all the Page Group plc Group Companies outside the EEA and their addresses can be accessed [here](#)

If you would like details of the particular Group Companies which can access your personal information, please contact us using the details in the [Contact section](#) below.

We apply equal rigour to the security of data held and processed across the whole of the global network. Each Group Company outside the EEA with access to data in

the EEA, enters into a specific data protection agreement with Your Employer thereby undertaking to meet the same standards of data security and to act in accordance with data protection principles applicable under the strict European data protection laws. This agreement is based on the Model Clauses as approved by the EU Commission. If you would like a copy of this agreement, please contact us using the details in the [Contact section](#) below.

Trusted third-party service providers

We will share your personal information with third-party service providers (including contractors and designated agents). The following are the primary activities carried out by third-party service providers:

- payroll;
- background checks (where it is legally permissible to undertake such checks);
- medical assessment;
- pension administration;
- benefits provision and administration;
- professional advice;
- share and share option scheme administration;
- data analytics; and/or
- IT and other consultancies.

We ensure that such third parties agree to comply with similar standards of privacy and confidentiality as those applied by Your Employer. To the extent that any personal information is provided to third parties outside the EEA, or who will access the information from outside the EEA, we will ensure that approved safeguards are in place, such as the approved Model Clauses or the EU/US Privacy Shield.

Regulatory and Law Enforcement Agencies

If we receive a request from a regulatory body or law enforcement agency, and if permitted under GDPR and other laws, we may disclose certain personal information to such bodies or agencies.

New business owners

If we or our business merges with or is acquired by another business or company, we will share your personal information with the new owners of the business or company and their advisors. If this happens, you will be notified.

How long we will hold your information

We will only retain your personal information 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 these purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of Your Employer we will retain and securely destroy your personal information in accordance with our data retention policy.

Data security

We have put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business

need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so or where we believe it is necessary to protect you.

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us. Where a self-service portal is available, you are able to update some of your personal information, alternatively, please contact HR.

Country	How to update your information
Turkey	Email Administration
Portugal	Email Administration
Sweden	Email Administration
Spain	Email HR / Payroll
Italy	Email HR / Payroll
Belgium	Email HR / Payroll
Luxembourg	Email HR / Payroll
Switzerland	Email HR / Payroll
Poland	Email HR / Payroll
SSC in Spain	Email sschrteam@pagegroup.eu
Netherlands	ESS portal or email HR
Germany	ESS portal or email HR
Austria	ESS portal or email HR

Your rights on information we hold about you

You have certain rights in relation to personal information we hold about you. Details of these rights and how to exercise them are set out below. We will require evidence of your identity before we are able to act on your request.

Right of Access

You have the right at any time to ask us for a copy of the personal information that we hold about you and to check that we are lawfully processing it. Where we have good reason, and if the GDPR permits, we can refuse your request for a copy of your personal information, or certain elements of the request. If we refuse your request or any element of it, we will provide you with our reasons for doing so.

Right of Correction or Completion

If personal information we hold about you is not accurate or is out of date and requires amendment or correction you have a right to have the data rectified or completed.

Right of Erasure

In certain circumstances, you have the right to request that personal information we hold about you is erased e.g. if the information is no longer necessary for the purposes for which it was collected or processed or our processing of the information is based on your consent and there are no other legal grounds on which we may process the information.

Right to object to or restrict processing

In certain circumstances, you have the right to object to our processing of your personal information. For example, if we are processing your information on the basis of our legitimate interests and there are no compelling legitimate grounds for our processing which override your rights and interests.

You may also have the right to restrict our use of your personal information, such as in circumstances where you have challenged the accuracy of the information and during the period where we are verifying its accuracy.

Right of Data Portability

In certain instances, you have a right to receive any personal information that we hold about you in a structured, commonly used and machine-readable format.

In such circumstances, you can ask us to transmit that information to you or directly to a third party organisation.

The above right exists only in respect of personal information that:

- you have provided to us previously;
- is processed on the basis of certain lawful grounds; and
- is processed by us using automated means.

While we are happy for such requests to be made, we are not able to guarantee technical compatibility with a third party organisation's systems. We are also unable to comply with requests that relate to personal information of others without their consent.

Exercise of your rights

You can request the exercise of any of the above rights by contacting us using any of the methods in the [Contact section](#) below.

Most of the above rights are subject to limitations and exceptions. We will provide reasons if we are unable to comply with any request for the exercise of your rights.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for

access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. You can do this by contacting us using the details in the [Contact section](#) below.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Complaints

If you are unhappy about our use of your personal information, you can contact us using the details in the [Contact section](#) below. You are also entitled to lodge a complaint with the Data Protection Regulator for the country in which you work. A list of relevant authorities in the EEA and the European Free Trade Area can be accessed [here](#).

If you have a complaint concerning our activities outside of the country in which you work, you may prefer to lodge a complaint with a different supervisory authority. A list of relevant authorities in the EEA and the European Free Trade Area can be accessed [here](#).

Changes to our Privacy Policy

We reserve the right to change or update this Privacy Policy at any time. If we change our Privacy Policy in the future, we will advise you of material changes or updates to our Privacy Policy by e-mail.

We may also notify you in other ways from time to time about the processing of your personal information.

Equal Opportunities

Your Employer is an equal opportunities employer and a company committed to diversity. This means that all job applicants and members of staff will receive equal treatment and that we will not discriminate on grounds of gender, marital status, race, ethnic origin, colour, nationality, national origin, disability, sexual orientation, religion or age.

As part of our commitment to equal opportunities we will from time to time use information provided by you for the purposes of diversity monitoring. All such information will be used on an anonymised basis. Please [click here](#) for more information on diversity.

Contact

If you have any enquiries or if you would like to contact us about our processing of your personal information, including to exercise your rights as outlined above, please contact us using the details in the [Contact section](#) below:-

When you contact us, we will ask you to verify your identity.

If you have a complaint please contact us either by email or letter to the following address:-

gdpr@pagegroup.eu

Or contact Louis Botha, our Data Protection Officer

Email: dpo@page.com

Post: Data Protection Office
Michael Page International Recruitment Limited
2nd Floor
61 Aldwych
London
WC2B 4AE

When you contact us, we will ask you to verify your identity.

The registered office of each Page Group Plc EEA subsidiary can be found following this [link](#)

Document control

Version	Date	Details	Actor
V1		Initial Approved version for GDPR	

Privacy policy: The Information we collect

Right to Object: You have a legal right to object at any time to processing of your personal information which is based on our legitimate interests, unless there are compelling legitimate ground for our continued processing.

We are committed to protecting the privacy and security of your personal information.

Country specific categories of personal information

Different countries may have specific legal restrictions on the collection of certain categories of personal information. The categories of personal "special categories" of more sensitive personal information listed in this document apply to "BELGIUM" only. Categories relating to the collection in other countries is documented in country specific documents.

The Information we collect

We will collect, store, and use the following main categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
- Date of birth;
- Gender;
- Marital status and dependants;
- Next of kin and emergency contact information;
- Social Security number;
- Bank account details, payroll records and tax status information;

- Salary, bonus, annual leave, pension and benefits information;
- Start date;
- Location of employment or workplace;
- Copy of driving licence if needed;
- Copy of passport or ID;
- Copy of your Work and Residences Permits;
- Recruitment information (including copies of right to work documentation, references, assessments done during recruitment process and other information included in a CV or cover letter or as part of the application and selection process);
- Employment records (including job titles, work history, working hours, training records and professional memberships);
- Compensation history;
- Performance information;
- Disciplinary and grievance information;
- Other information obtained through electronic means;
- Information about your use of our information and communications systems;
- Photographs.

We may also collect, store and use the following "special categories" of more sensitive personal information (health or national origin for example)

Other sensitive personal information that attracts particular protection under GDPR includes information about religious beliefs, sexual orientation and political opinions. However, we would not expect to hold such information unless you provided it to us for a particular purpose.

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