

# Website Privacy Notice for Clients

## INTRODUCTION

Welcome to the Pangaea Global Associates Ltd privacy notice.

Pangaea Global Associates Ltd respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively you can download a pdf version of the policy. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

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### **1. IMPORTANT INFORMATION AND WHO WE ARE**

## PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Pangaea Global Associates Ltd collects and processes your personal data through your use of this website and by using our recruitment services, including any data you may provide through this website when you fill a form and any information and details you may provide by e-mail or any data you may provide to us directly.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

## **CONTROLLER**

Pangaea Global Associates Ltd is the controller and responsible for your personal data (collectively referred to as "Pangaea Global Associates Ltd", "we", "us" or "our" in this privacy notice).

Pangaea Global Associates Ltd is the controller and responsible for this website.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

## **CONTACT DETAILS**

Our full details are:

Pangaea Global Associates Ltd

Name or title of data privacy manager: Natalie Gardner, Managing Director

Email address: [privacy@pangaeaglobalassociates.com](mailto:privacy@pangaeaglobalassociates.com)

Postal address: Pangaea Global Associates 4th Floor, Churchgate House, 56 Oxford St, Manchester M1 6EY

Telephone number: +44 333 9398014

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

This version was last updated on 8/05/2018

The data protection law in the UK changed on 25 May 2018. Although this privacy notice sets out most of your rights under the new laws, we might update the notice from time to time to take new guidance, rules, regulations and best practice into account.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. THE DATA WE COLLECT ABOUT YOU

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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, job role or position held.
- **Contact Data** includes postal address, email address and telephone numbers, which may include professional contact details.
- **Financial Data** including bank details you may supply to us.
- **Transaction Data** includes details about payments from you or your company following use of our services.
- **Technical Data** includes internet protocol (IP) address, time zone setting and location, operating system and platform and other technology on the devices you use to access this website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to be able to contact you or provide you with our candidates' details).

## 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Job title, Position, Employer

or Role by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- Fill the contact form on our website;
  - Request marketing to be sent to you;
  - Contact us directly;
  - Give us some feedback.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
    - Social media and Job boards based inside or outside the EU, and the Internet (for example, public LinkedIn accounts or from your professional profile on your company's website)
    - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

#### **4. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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.
- Where we need to comply with a legal or regulatory obligation.

See Schedule 2 below to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by sending us an email to: [privacy@pangaeaglobalassociates.com](mailto:privacy@pangaeaglobalassociates.com)

#### **PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us on [privacy@pangaeaglobalassociates.com](mailto:privacy@pangaeaglobalassociates.com) if you need details about the specific legal ground we

are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new client	(a) Identity (b) Contact	Performance of a contract with you
<p>To process and provide you with recruitment services including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p>	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policies</p> <p>(b) Asking you to leave a review or take a survey</p>	(a) Identity (b) Contact (c) Profile (d) Communications	(a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated and to measure the satisfaction of our clients)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation

<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of clients for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about candidates and to provide general staffing and recruitment assistance and advice.</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<p>Performance of a contract with you</p>

## EMAILS OF INTEREST FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which candidates may be relevant for you.

## CHANGE OF PURPOSE

We will only use your personal data 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. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at: [privacy@pangaeaglobalassociates.com](mailto:privacy@pangaeaglobalassociates.com)

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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

## 5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Candidates

- Specific third parties such as lawyers, tax administration, auditors and accountants
- Suppliers such as data centres, cloud storage, IT service providers, e-mail providers and data base managements systems (in this case, we will ensure that data is encrypted or anonymised to protect your privacy rights).

## **6. INTERNATIONAL TRANSFERS**

From time to time, we may transfer your personal data outside the European Economic Area (EEA) from time to time, such as when using CRM systems, cloud storage, email services or data centres, or when providing your contact details to our candidates who may be based outside of the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to your personal data by ensuring that at least one of the following safeguards is implemented:

- We may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we make transfers to the US, we may transfer data to third parties if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.
- Please contact us on [privacy@pangaeaglobalassociates.com](mailto:privacy@pangaeaglobalassociates.com) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Details of our third-party providers are set out in Schedule 1 below.

## **7. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. DATA RETENTION**

### **HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

We will only retain your personal data 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 those purposes through other means, and the applicable legal

requirements.

However, by law we have to keep basic information about our clients (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **9. YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see Schedule 2 below to find out more about these rights:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please send an email to: [privacy@pangaeaglobalassociates.com](mailto:privacy@pangaeaglobalassociates.com)

### **NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **TIME LIMIT TO RESPOND**

We try to respond to all legitimate and fully completed requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. GLOSSARY

### LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us on: [privacy@pangaeaglobalassociates.com](mailto:privacy@pangaeaglobalassociates.com)

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### Schedule 1 - THIRD PARTIES

#### EXTERNAL THIRD PARTIES

- Service providers acting as processors based in the United Kingdom such as Zoho Recruit who provide IT and system administration services.
- Social media and other web-based platforms, such as LinkedIn or Job boards acting as controllers based inside and outside of the EU who provide personal data.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

### Schedule 2 - YOUR LEGAL RIGHTS

You have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.