

# Privacy Policy

Updated 19<sup>th</sup> August 2024

This privacy notice provides a framework of understanding about the personal data that are collected by **Swift Employment Services Limited** ("hereinafter called the Data Controller"), as required by law including the provisions of the European Union's General Data Protection Regulation (GDPR) and the UK GDPR. Please note that when we refer to GDPR throughout this Privacy Notice, we are referring to both the GDPR and UK GDPR.

Your personal data is processed by **Swift Employment Services Limited**. Accordingly refer below for the relevant **Swift Employment Services Limited** entity responsible for your personal data. This privacy notice provides an understanding for you about the legal entities which make up **Swift Employment Services Limited** and how we are committed to respecting your privacy, protecting your personal data and outlining your statutory privacy rights and how the law protects you.

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## Data Controller

The Data Controller is **Swift Employment Services Limited** with the registered office in 17 Moorcroft Road, Bradford, BD4 6NQ.

### **Swift Employment Services Limited Legal Entities:**

Swift Employment Services Limited

QUBA Solutions Limited (payroll and invoicing)

The personal data collected will be controlled and processed by the Data Controller. Additionally, personal data may be processed or jointly controlled by affiliates of the Data Controller listed here.

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## Who this Privacy Notice applies to

This privacy notice applies to:

- our job candidates to whom we provide work-related opportunities and services
- recipients of our career services

- our associates, who are people we source or place on assignment with one of our clients, or individuals to whom we provide outplacement or career transition services
- users of our websites and apps listed here (the "Sites")
- representatives of our business partners, clients and vendors

This privacy notice does not apply to our staff employees, who are individuals employed by **Swift Employment Services Limited** and who work directly for **Swift Employment Services Limited** and not directly with a **Swift Employment Services Limited** client.

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## Information We Collect

We may collect personal data about you in a variety of ways, such as through our websites and social media channels; at our events; via various contact channels and interaction with you including telephone, chat, messaging, through job applications; in connection with in-person recruitment; or in connection with our interactions with clients, customers, suppliers and vendors.

Depending on the nature of our business relationship, we may collect the following personal data, including, but not limited to (and as permitted under local law):

Identity and contact information (such as name, employee ID, postal address, email address and telephone number); registration data such as username and password when you register on our Sites or in our apps;

Cookies, web beacons and web server logs by automated means, consistent with the cookie notice; information you provide about friends or other people you would like us to contact (with their agreement).

Other information you may provide to us, such as in surveys or through any contact with us. When you visit our Sites we may gather information relating to your device, browser and website navigation including, Internet Protocol (IP) address, internet Service Provider, device information and browser locale preferences e.g. your language and time zone, geographic location (country only), preferred language used to display, dates, timestamps, the internet address from which you were directly linked through to our website, control system that you use, parts of the website that you visit, pages of the website that you have visited and information you viewed, hyperlinks you have clicked and material that you send to or download from our website such as reports and whitepapers (note this will also enable us to identify your device, browser and interaction without website).

In addition, if you are an associate or job candidate, or when you apply for a position or create a user account, we may collect the following types of personal data (as permitted under local law):

Personal characteristics and identification information such as gender, date of birth, correspondence language, nationality, residence and work permit information, national identification numbers, if applicable).

Curriculum vitae (CV)/resume data which may include contact details, social media, unique reference location (URL), employment history, education history, professional memberships, qualifications, language proficiency and other work and knowledge related skills and abilities, photo/profile picture, job references or any other individuals requested to provide feedback on your work related performance, results of any (online) tests, project listing, language and other skills, salary expectations/information, roles/opportunities of interest.

Information we may have received or conducted as part of your application (e.g., log of any events, interviews including any digital/video recorded interviews you attended, any training or webinars attended, interview evaluations, information from references, and other information such as criminal records and debt enforcement information that you voluntarily provide to us when you submitted your application, including special categories of personal data such as health data, if applicable); and communication data (e.g. personal and business emails sent and received, including document attachments, telephone calls, messages via SMS, instant messaging and chat, or any other digital communication (e.g., via user account, web form) in interaction with Swift Employment Services systems).

If you provide or disclose personal data about your family or other third parties (e.g., emergency contacts or references) as part of your application, we assume that you are authorised to do so, and that this personal data is correct. By submitting personal data about third parties, you confirm this. Furthermore, you also ensure that these third parties have been informed about this Privacy Notice.

When you accept a position with us and are placed on assignment as a temporary worker with one of our clients, we may also collect the following personal data:

Information about the family such as marital status and emergency contacts.

Financial information such as bank details, tax-related information and benefits information.

Personal identifiers such as national insurance number, social security number or other government – issued identification, citizenship and work

authorisation status. In some cases, the personal data we process may also include special categories of personal data such as disabilities, health, ethnicity, sexual orientation, religious beliefs information to monitor diversity in recruitment, as well as drug test results, criminal and other background checks, where required by law or with your explicit consent.

As a rule, your personal data is collected directly from you as part of the application process. In certain circumstances, your personal data may also be gathered from other bodies (such as public authorities) due to legal requirements. In addition, we may have received personal data from third parties (e.g., former employers, employment agencies, background check providers or from publicly accessible sources such as social networking platforms and job boards). Communication data (e.g. personal and business emails sent and received, including document attachments, telephone calls, messages via SMS, instant messaging and chat, or any other digital communication (e.g., via LinkedIn, user account, web form) in interaction with **Swift Employment Services Limited** systems).

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## How We Use the Information We Collect

We may use the data collected for the following purposes (depending on our relationship with you and as permitted under local law):

Identifying you and/or authenticating your identity; sending you updates and notification regarding the services you are receiving and other related communications; providing workforce solutions and connecting people to work; creating and managing online accounts and optimising and personalising your user experience (please also consult the “Terms of Use” we publish on each Site footer); providing coaching, feedback, analysis and advice and guidance to support you in your career management/development; tailoring and personalising the support we offer based on eligibility, suitability, and other criteria; conducting video interviews and assessments of your suitability and availability for positions and/or client talent pools; providing human resource services including the administration of benefit programs, payroll and payment processing, travel and expenses, performance management, grievance/disciplinary management; supporting our diversity and inclusion efforts and/or monitoring; ensuring reasonable adjustment for individuals with disabilities or medical conditions that require it; managing our client, vendor, supplier and business partner relationships; responding to individuals' enquiries, claims and requests for assistance; performing data analytics, such as; analysing platform usage across our users, analysing our job candidate base, assessing individual performance and capabilities, including scoring on work-related skills, identifying skill shortages, using information to match individuals and potential opportunities, analysing pipeline

data (trends regarding hiring practices), determining the effectiveness of our engagement strategy, and determining the effectiveness of our products and services.

Aggregating data as part of our analytics efforts operating, evaluating and improving our business and services; managing our communications; performing accounting, auditing and other internal functions; protecting against, identifying and seeking to prevent fraud and other deceptive practices and unlawful activity, claims and other liabilities; enhancing the security of our network and information systems; complying with and enforcing applicable legal requirements, relevant industry standards, contractual obligations and our policies.

Communicating around the services we offer, programs, special events, offers, surveys, evaluations, and market research - if you are a vendor representative, business partner or client representative; where permitted under law, consistent with the Data Controller's Cookie and Advertising Notice (which is incorporated herein by reference) and only if you have given your consent, to send promotional materials, alerts regarding available positions and other communications; where permitted under law and only if you have given your consent, to communicating about, and administering participation in, special events, promotions, programs, offers, surveys, contests and market research; we may contact you for marketing purposes about similar services. You will have the opportunity to opt out of receiving these communications at any time by contacting Swift Employment Services Limited by phone, email, messaging or by post.

In addition to the activities listed above, if you are an associate or job candidate and you apply for a position or create an account to apply for a position, as permitted under local law, we use the information described in this privacy notice for the following purposes: providing you with job opportunities and work; providing HR services to you, including administration of benefit programs, payroll, performance management and disciplinary actions; providing additional services to you, such as training, career counselling and career transition services; assessing your suitability as a job candidate and your associate qualifications for positions; and performing data analytics, such as (i) analysing our job candidate and associate base; (ii) assessing individual performance and capabilities, including scoring on work-related skills; (iii) identifying skill shortages; (iv) using information to match individuals and potential opportunities, and (v) analysing pipeline data (trends regarding hiring practices).

All processing will be carried out based on adequate legal grounds which may fall into the below categories:

Consent - This is where consent or explicit consent is obtained from the data subject, where required by applicable law e.g. when you tick a box to receive email newsletters.

Legal - This is where we are relying on a statutory or legal requirement to process your data.

Contract - This is where we are relying on a contractual requirement or any pre-contractual requirement necessary to enter into a contract e.g. processing your personal data to ensure that your wages are paid.

Legitimate interest - this is where we are processing your data for purposes where we consider it is in the interest of all parties e.g. providing user access to the website to be provided with the services offered. Please see our section on Legitimate Interests below to learn more about these interests and when we may process information in this way.

Vital interests - this is where the processing of data is necessary to an individual to protect life.

We also may use the information in other ways for which we provide specific notice at or prior to the time of collection.

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## **Legitimate Interest**

We may process personal data for certain legitimate business purposes, which includes all of the following:

Where the process enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of our clients, candidates and associates, such as utilising technical measures, e.g. the transcription feature; to identify and prevent fraud; to enhance security of our network and information systems; to better understand how people interact with our websites.

We may contact you for marketing purposes about similar services. You will have the opportunity to opt out of receiving these communications at any time by contacting Swift Employment Services Limited by phone, email, messaging or by post., and to determine the effectiveness of promotional campaigns and advertising.

Whenever we process data for these purposes we will ensure that we keep your rights in high regard and take account of these rights. You have the right

to object to such processing, and if you wish to do so please **write to Swift Employment Services Limited**. Please bear in mind that if you exercise your right to object this may affect our ability to carry out and deliver services to you for your benefit.

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## How We Process and Protect Personal Information

We process the personal data we collect for the purposes defined in this notice and for a period only as long as is necessary for the purposes we collected it. Different legal obligations may also require us to keep different data for different periods of time.

We maintain administrative, technical and physical safeguards designed to protect the personal data you provide against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use. In order to ensure the appropriate security and confidentiality of the personal data, we apply the following security measures:

- Encryption of data in transit;
- Strong user authentication controls;
- Hardened network infrastructure;
- Network monitoring solutions.

## How Long We Store Data We Collect

We will keep your personal data for the time period necessary to achieve the purposes described in this Privacy Notice, taking into account applicable statute of limitation periods and records retention requirements under applicable law.

Subject to applicable law, we will retain your personal data as required by the company to meet our business and compliance obligations, for example, to comply with our tax and accounting obligations.

We store in our systems the personal data we collect in a way that allows the identification of the data subjects for no longer than it is necessary in light of

the purposes for which the data was collected, or for which that data is further processed.

We use the following criteria to determine our retention periods by taking into account:

- The necessity to retain the personal data collected in order to offer services established with the user;
- The legitimate interest of the Data Controller as described in the purposes above;
- The existence of specific country or state legal obligations that make the processing and related storage necessary for specific period of times.

## Information we disclose

We may disclose personal data that we collect about you, as described in this privacy notice or in separate notices provided in connection with particular activities such as:

- We may share personal data with vendors who perform services on our behalf based on our instructions. We do not authorise these vendors to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements.
- We also may share your personal data (i) with our subsidiaries and affiliates; (ii) if you are a job candidate, with clients who may have job opportunities available or interest in placing our job candidates; and (iii) with others with whom we work, such as job placement consultants and subcontractors, to find you a job. In addition, we may disclose personal data about you (i) if we are required to do so by law or legal process; (ii) to law enforcement authorities or other government officials based on a lawful disclosure request; and (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity. We also reserve the right to transfer personal data we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganisation, dissolution or liquidation).

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# Artificial Intelligence (AI) / Machine Learning (ML)

A number of the services we offer are enabled with AI, which may include AI/ML. With the assistance of AI, we can connect the right individuals with the best opportunities and get people into work more efficiently or prepare them for the job market more readily.

We perform risk assessments of the AI solutions we use at **Swift Employment Services Limited** and use human oversight to the fullest extent possible to ensure no automated decisions are made that produce any legal or similarly significant effects on individuals.

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## Links to External Tools and Resources

We may provide links to external third-party websites operated by organisations not affiliated with **Swift Employment Services Limited**. We do not disclose your personal information to organisations operating such linked third-party websites and we do not review or endorse, and are not responsible for, the privacy practices of these organisations.

This privacy notice applies solely to information collected by **Swift Employment Services Limited** and its subsidiaries and affiliates through the services.

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## Your Rights as a Data Subject

When permitted by applicable law, a data subject can exercise under Articles 15 to 22 of the GDPR the following specific rights:

Right of access: A data subject has the right to access his or her personal data concerning which in order to verify that his or her personal data is processed in accordance to the law. Should you wish to exercise your right of access please contact Swift Employment Services Limited.

Right to rectification: A data subject has the right to request the rectification of any inaccurate or incomplete data held about him or her, in order to protect the accuracy of such information and to adapt it to the data processing.

Right to erasure: A data subject has the right to request that the Data Controller erases information about him or her and to no longer process that data. Should you wish to exercise your right of access please write or telephone Swift Employment Services Limited.

Right to restriction of processing: A data subject has the right to request that the Data Controller restricts the processing of his or her data.

Right to data portability: The data subject has the right to request the data portability meaning that the data subject can receive the originally provided personal data in a structured and commonly used format or that the data subject can request the transfer of the data to another Data Controller.

Right to object: The data subject who provides a Data Controller with personal data has the right to object, at any time to the data processing on a number of grounds as set out under GDPR without needing to justify his or her decision.

Right to not be subject of automated individual decision-making: The data subject has the right to not be subject to a decision based solely on automated processing, including profiling, if such profiling produces a legal effect concerning the data subject or similarly significantly affects him or her.

Right to lodge a complaint with a supervisory authority: Every data subject has the right to lodge a complaint with a supervisory authority, in particular in the EU Member State of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes GDPR.

Whenever the processing is based on the consent, as under art.7 of the GDPR, the data subject may withdraw their consent at any time. There may be circumstances where we will still need to process your data for legal or official reasons. We will inform you if this is the case. Where this is the case, we will restrict the data to only what is necessary for the purpose of meeting those specific requirements.

If you believe that any of your data that we process is incorrect or incomplete, please contact us and we will take reasonable steps to check its accuracy and correct it where necessary.

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## **Choosing to Opt-Out**

If you wish to opt-out at any time, you can do so by directly contacting by post, email or phone call to Swift Employment Services Limited.

Please note that by opting-out we will continue to process any existing applications. However, moving forward you will not be matched against future vacancies or receive emails from us regarding jobs and job related content.

## **How to Contact Us**

If you have any questions or comments about this privacy notice, or if you would like to exercise your rights, please write to:

The Data Privacy Officer  
Swift Employment Services Limited  
17 Moorcroft Road  
Bradford  
BD4 6NQ