



# Candidate Privacy Statement

Effective January 1, 2023

This Privacy Statement describes how Accesso Technology Group, plc and its affiliates (*accesso*) collect and process personal data about you, how we use and protect this information, and the rights that may be available to you under applicable law in relation to this information.

This privacy statement describes the following:

- Personal data we use
- How we use your personal data and the basis on which we use it
- Your rights over your personal data
- Data sharing
- Data security and storage
- International data transfer
- Contact us and changes to the Privacy Statement

This privacy statement describes the handling of personal data obtained about internal and external job applicants, including referral and applicants who have applied directly through *accesso's* career page as well as through third party agencies and recruiters on behalf of candidates. This privacy statement also describes the handling of personal data of any prospective candidates, such as those individuals who expressed an interest in receiving news and details about future *accesso* opportunities. Personal data is information, or a combination of pieces of information, that could reasonably allow you to be identified.

## 1. PERSONAL DATA WE USE

We will collect your personal data from you directly and potentially from other sources.

### 1.1 Data we collect directly from you:

The categories of data that we collect directly from you include:

#### 1) Identifiers:

- a) personal (e.g., name) and contact details (e.g., phone number and email address)

2) Professional and Employment-Related Information:

- a) information contained in your resume or CV, and other documents related to the application or recruitment process (e.g., cover letter, transcripts)
- b) any other information you may choose to voluntarily submit to us in connection with your application (e.g., information contained in a cover letter, information disclosed in an interview or information you volunteer regarding your criminal records history, compensation history, or personal situation)

3) Educational Information:

- a) educational details (e.g., educational history, qualifications, certifications, skills) and job history (e.g., previous employment, roles, performance history)

4) Internet Activity Information:

- a) we may also collect information about you using cookies and similar technologies when you use or browse our website. See our [Privacy Policy](#) for further information about how this works

1.2 Data we collect from other sources:

We may collect the following data about you from other sources:

1) Professional and Employment-Related Information:

- a) background check data, potentially including your criminal records history, employment history, educational history and/or compensation history, from employment screening agencies, publicly available registers or databases, former employers and/or educational institutions (as allowed by local laws)
- b) information about your performance from references, or former employers you work with and/or with whom you may have worked in the past who may provide feedback about you (post offer acceptance)
- c) information about you from *accesso* employees who interview you and who may provide feedback about you

2) Internet Activity Information:

- a) publicly available information from websites or social media, including information that you choose to voluntarily submit to us in connection with your application (e.g., when applying through LinkedIn)

**2. HOW WE USE YOUR PERSONAL DATA AND THE BASIS ON WHICH WE USE IT**

We limit our use of your personal data. We aim to only collect and use your personal data for specific, necessary reasons and aim to explain our use of your personal data. For example, we use your personal data to:

- (a) create and manage the recruitment process, job applications and a database of interested individuals
- (b) assess and evaluate your skills, qualifications and interests against the position applied for and/or other positions within *accesso*
- (c) communicate with you via text messages in relation to your expressed interest in *accesso*, job opportunities, application or the recruitment process
- (d) verify your information, including through reference checks and, where applicable, background checks
- (e) detect, prevent and respond to fraud or potentially illegal activities (such as intellectual property infringement), misuse of the recruitment system, this Candidate Privacy Statement or other *accesso* policies
- (f) perform audits, assessments, maintenance and testing or troubleshooting activities related to our recruitment processes
- (g) comply with legal obligations to which we are subject and cooperate with regulators and law enforcement bodies
- (h) respond to your enquiries and requests

We must have a legal basis to process your personal data. In most cases the legal basis will be one or more of the following:

- (a) to comply with our contractual obligations to you or to take steps to enter into a contract with you
- (b) to comply with our legal obligations
- (c) with your consent

(d) to meet our legitimate interests, for example to conduct our recruitment processes efficiently and fairly or to manage applicants effectively. When we process personal data to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy or other fundamental rights and freedoms are not overridden by our legitimate interest to comply with our legal obligations, for example obtaining proof of your right to work status to enable us to meet relevant obligations

When we are required by local law to collect certain personal data about you, your failure to provide this data may prevent or delay the fulfilment of our legal obligations and may impact our ability to employ you. If we ask for your consent to process your personal data, you may withdraw your consent at any time by contacting us using the details at the end of this privacy statement.

### **3. YOUR RIGHTS OVER YOUR PERSONAL DATA**

You have certain rights regarding your personal data, subject to applicable local laws. These include the following rights to:

- access your personal data
- fix any errors with your personal data
- in some instances, erase or delete your personal data
- receive your personal data in a usable electronic format and transmit it to a third party (right to data portability)

If you would like to exercise any such right, please contact us at [PrivacyContact@accesso.com](mailto:PrivacyContact@accesso.com).

We encourage you to contact us to update or correct your information if it changes or if the personal data we hold about you is inaccurate.

### **4. DATA SHARING**

While we do not sell or market your personal data, we may share your personal data with third parties in limited situations, including with:

- Service providers and business partners. We may share your personal data with our service providers and business partners that perform business operations for us. For example, we may partner with other companies for text messaging, to host the recruitment process and analyze data to improve performance or engage third parties to audit our systems, products or practices.
- Law enforcement agency, court, regulator, tax authority, government authority or other third party. We may share your personal data with these parties if necessary, to comply with a legal or regulatory obligation, or otherwise to protect our rights, your rights or the rights of any third party.

## **5. DATA SECURITY**

Security is an integral part of our business model and we put significant resources into making sure your data is protected. This involves technical measures (such as implementing security software) and organizational measures (such as only allowing staff to access your data if there is a business need to do so). These measures are aimed at ensuring the on-going integrity and confidentiality of personal data. We evaluate these measures on a regular basis to ensure the security of the processing.

We will retain your personal data for a period of time that enables us to:

- Maintain business records for analysis, understanding market trends and/or audit purposes
- Comply with record retention requirements as required by local law or other relevant legal or regulatory requirements
- Defend, establish, exercise or bring any existing or potential legal claims
- Ensure fraud detection and prevention
- Respond to any queries or complaints you may have
- With your consent, suggest roles that may be of interest to you

We will delete your personal data when it is no longer required for these purposes. If there is any personal data that we are unable, for technical reasons, to delete entirely from our systems, we will ensure that appropriate measures are taken to prevent any further processing or use of the personal data.

## **6. INTERNATIONAL DATA TRANSFER**

If you are an individual located in the European Economic Area, the United Kingdom, Canada or another jurisdiction outside of the United States with laws and regulations governing personal data collection, use, and disclosure that differ from United States laws, please be aware that information we collect (including through the use of methods such as cookies and other web technologies) may be processed and stored in the United States or in other countries where we or our third-party service providers have operations. We may also process personal data submitted relating to individuals in Europe via the Standard Contractual Clauses.

## **7. CONTACT US AND CHANGES TO THE PRIVACY STATEMENT**

If you have questions or concerns regarding the way in which your personal data has been used or about this privacy notice, please contact the Privacy Team at [PrivacyContact@accesso.com](mailto:PrivacyContact@accesso.com).

We reserve the right to amend this privacy notice at our discretion and at any time and will notify you by email or through a notice on our website homepage.

**January 2023**