Recruitment Privacy Notice

Sword ("We", "Us") are committed to protecting and respecting your privacy. This Privacy Notice (together with any other documents referred to herein) sets out the basis on which the personal data collected from you, or that you provide to Us, will be processed by Us in connection with our recruitment processes. Please read the following carefully to understand our views and practices regarding your personal data and how We will treat it.

For the purpose of the General Data Protection Regulation ("GDPR") and the United Kingdom General Data Protection Regulation ("UK GDPR") and the UK Data Protection Act 2018, the Data Controller is Sword IT Solutions Limited.

We use Workable, an online application provided by Workable Software Limited, to assist with our recruitment process. We use Workable to process personal information as a data processor on our behalf. Workable is only entitled to process your personal data in accordance with our instructions.

Where you apply for a job opening posted by Us, these Privacy Notice provisions will apply to our processing of your personal information in addition to our other Privacy Notice which has been provided to you separately or is available on our Website.

Where you apply for a job opening via the application function on a job site or similar online service provider ("Partner"), you should note that the relevant Partner may retain your personal data and may also collect data from Us in respect of the progress of your application. Any use by the Partner of your data will be in accordance with the Partner's Privacy Notice.

Your Personal Information

Information We collect from you

We collect and process some or all of the following types of information from you:

- Information that you provide when you apply for a role. This includes information provided through an online job site, via email, in person at interviews and/or by any other method.
- In particular, We process personal details such as name, email address, address, telephone number, date of birth, qualifications, experience, information relating to your employment history, skills and experience that you provide to Us, as well as your video in case you conduct your interview using the Video Interview feature.
- If you contact Us, We may keep a record of that correspondence.
- A record of your progress through any hiring process that We may conduct.
- Details of your visits to Workable's Website including, but not limited to, traffic data, location data, weblogs and other communication data, the site that referred you to Workable's Website and the resources that you access.
- Your video interview in case your interview was performed through the video interview feature.

Information We collect from other sources

Workable provides Us with the facility to link the data you provide to Us, with other publicly available information about you that you have published on the Internet, this may include sources such as LinkedIn and other social media profiles.

Workable's technology allows Us to search various databases, some publicly available and others not, which may include your personal data (including your CV or Resumé), to find possible candidates to fill our job openings. Where We find you in this way We will obtain your personal data from these sources.

We may receive your personal data from a third party who recommends you as a candidate for a specific job opening or for our business more generally.

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Uses made of your information

Lawful basis for processing

We rely on legitimate interest as the lawful basis on which We collect and use your personal data. Our legitimate interests are the recruitment of staff for our business.

Purposes of processing

We use information held about you in the following ways:

- To consider your application in respect of a role for which you have applied.
- To consider your application in respect of other roles.
- To communicate with you in respect of the recruitment process.
- To enhance any information that We receive from you with information obtained from third party data providers.
- To find appropriate candidates to fill our job openings.
- To help our service providers (such as Workable and its processors and data providers) and Partners (such as the job sites through which you may have applied) improve and develop their services.

Automated decision making / profiling

We may use Workable's technology to select appropriate candidates for Us to consider based on criteria expressly identified by us, or typical in relation to the role for which you have applied. The process of finding suitable candidates is automatic, however, any decision as to who We will engage to fill the job opening will be made by our staff.

AI-assisted CV formatting

We use HireARA, a tool provided by Access UK Ltd, to reformat your CV into our standard format so that clients can consider your skills and experience for roles and assignments. The tool uses AI to reformat the professional information in your CV. We remove your direct contact details from the version shared with clients so that it focuses on your skills and experience. A member of our team checks the result before it is shared, and the tool is not used to score, rank or select you. Access and its providers process this information on our behalf and do not use your CV to train AI models.

Please include only the information relevant to the role you are applying for. There is no need to add sensitive personal details that are not needed. If you have any adjustment needs for the recruitment process, you are welcome to let our recruitment team know separately.

Disclosure of Your Information

As set out above, We pass your information to our third party service providers, including Workable, who use it only in accordance with our instructions and as otherwise required by law.

Where you have applied for a job opening through the Indeed Apply functionality, We will disclose to Indeed certain personal data that We hold, including but not limited to a unique identifier used by Indeed to identify you, and information about your progress through our hiring process for the applicable job opening, as well as other information that We hold about you, such as your name, contact details and other information involving analysis of data relating to you as an applicant for employment (collectively "Disposition Data"). Indeed's Privacy Notice in respect of Indeed's use of the Disposition Data is available on Indeed's website.

Where you have applied to a job opening through another service provider, We may disclose data similar to the Disposition Data defined above to such service provider. The service provider shall be the data controller of this data and shall therefore be responsible for complying with all applicable law in respect of the use of that data following its transfer by Us.

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How We store your personal data

Security

We take appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

Unfortunately, the transmission of information via the internet is not completely secure. Although We will do our best to protect your personal data, We cannot guarantee the security of your data transmitted through any online means, therefore any transmission remains at your own risk.

Where We store your personal data

Where We store your personal data in our own systems, it is stored in the UK or EEA.

The data that We collect from you and process using Workable's Services may be transferred to, and stored at, a destination outside the United Kingdom ("UK") or the European Economic Area ("EEA"). It may also be processed by staff operating outside the UK or the EEA who work for Us or for one of our suppliers. Such staff may be engaged in, among other things, the provision of support services.

Where we transfer your personal data outside the UK or EEA, we rely on appropriate safeguards, including the EU standard contractual clauses and the UK international data transfer agreement or addendum, rather than on your consent.

In particular, your data may be accessible to i) Workable's staff in the USA or ii) may be stored by Workable's hosting service provider on servers in the USA as well as in the EU. A Data Processor Agreement has been signed between Workable Software Limited and its overseas group companies, and between Workable Software Limited and each of its data processors. These data processor agreements are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data.

In addition, where your CV is processed through HireARA, some processing takes place outside the UK. This includes OpenAI in the United States (the AI service), a CV-parsing provider in Australia, and an Access support centre in Malaysia. These transfers are protected by the same type of safeguards described above.

If you would like further information please contact Us (see 'Contact' below). We will not otherwise transfer your personal data outside of the United Kingdom or EEA or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

How long We keep your personal data

We will hold all the data for 12 months. Your personal information will be deleted on one of the following occurrences:

- deletion of your personal information by you (or by another person engaged by you); or
- receipt of a written request by you (or another person engaged by you) to us.

The providers that support the service keep their own copies only briefly: the working copy in HireARA is set to delete after one month, and the AI provider keeps its copy for up to 30 days and does not train on it.

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Your rights

Subject to local data protection laws and in particular under the GDPR and the UK GDPR, you have a number of important rights free of charge. In summary, those include rights to:

- access to your personal data and to certain other supplementary information that this Privacy Notice is already designed to address
- require Us to correct any mistakes in your information which We hold
- require the erasure of personal data concerning you in certain situations
- receive the personal data concerning you which you have provided to Us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal data concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal data
- otherwise restrict our processing of your personal data in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws.

For further information on each of those rights, please see the guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation. If you would like to exercise any of those rights, please contact Us using our contact details below, let Us have enough information to identify you and proof of your identity, and let Us know the information to which your request relates.

How to complain

We hope that We can resolve any query or concern you raise about Our use of your information. The General Data Protection Regulation and the UK GDPR also give you the right to lodge a complaint with a supervisory authority, in the UK the Information Commissioner's Office (www.ico.org.uk).

Contact

All questions, comments and requests regarding this Privacy Notice should be addressed to sits-data.compliance@sword-group.com.