

KLW International Recruitment – Privacy Information (for Clients and Individuals Other than Candidates)

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KLW and Privacy

At KLW, we take data protection very seriously and understand how important it is to protect your privacy and the personal information that identifies who you are, including your name, email addresses, telephone numbers, job title and employer details.

This privacy notice tells you how we process personal information about you, and what your rights are in your relationship with us as a Data Controller.

KLW as Data Controller

The Data Controller is KLW International Recruitment Limited, registered company SC338936.

How do we collect information about you?

We may have an existing relationship with your organisation else obtain information about you from publicly-available web content and social and professional media. Information may also come from individuals who inform us that you or your employer may have suitable roles available.

What personal information do we collect and process?

Personal information that we collect about you may include your name, addresses, email addresses, telephone numbers, job title and employer details.

Data will be recorded in a variety of places, notably IT systems and storage, including email. KLW uses the services of an externally-hosted database provider, with which it has in place a formal Data Processing Agreement.

What do we do with your personal data?

We may use your personal information for any of the following purposes:

- to communicate with you as part of our normal business;
- to inform you of current and future job-seekers who may be of interest to you and your organisation;
- to inform you of changes to our policies, other terms and conditions, and to provide you with administrative information;
- to facilitate security and to manage commercial risks;
- to manage our business operations and comply with internal policies and procedures, including those relating to finance and accounting; billing and collections; IT systems; data and website hosting; business continuity; and records, and document management;
- to allow us to resolve complaints and to administer any requests you make regarding data access, correction or deletion;
- to comply with applicable laws and regulatory obligations (including laws outside your country of residence), such as those relating to anti-money laundering; to comply with legal process;

and to respond to requests from public and governmental authorities (including those outside your country of residence); and

- to establish and defend legal rights; to protect our operations, privacy, safety or property, and/or those of you or others; and to pursue available remedies or limit our damages.

Where we rely on Legitimate Interests as a legal basis for processing your data, we consider whether or not those interests are overridden by your individual rights and freedoms, and only continue with the processing if we conclude that they are not.

What legal basis do we use to process your information in these ways?

The processing is necessary to fulfil a contract

KLW will process your data when we need to do this to fulfil a contract, such as addressing an email to you, with an invoice attached, for a service that KLW has provided.

Legitimate Interest

KLW also processes your data when it is in our legitimate interests to do this, but only when these interests are not overridden by your data protection rights.

Our legitimate interests include:

- fulfilling our duties to our customers and other stakeholders;
- ensuring the security and integrity of our services;
- protecting the interests of our customers, employees and other individuals;
- selling and supplying services to our customers;
- promoting, marketing and advertising our services;
- sending communications that are relevant and tailored to individual clients;
- understanding our customers' activities, preferences, and needs;
- improving existing services and developing new services; and
- handling customer contacts, queries, complaints or disputes.

The processing is necessary because of a legal obligation that applies

KLW may process your data to comply with our legal and regulatory obligations, e.g. to assist in preventing crime, including working with law-enforcement agencies.

Automated decision-making

No KLW recruitment activities are based solely on automated decision-making.

Who has access to your personal information?

Within KLW, we ensure that access to personal information is restricted to those staff who need it to perform the functions of our business.

Who do we share your information with?

KLW may make personal information available to:

Job-seekers

In the undertaking of our business to match candidates with suitable roles, K LW may make personal information available to job-seekers and other individuals as required, e.g. sending your contact details to a candidate in relation to an agreed interview.

K LW service providers

This includes external third-party service providers, such as accountants, lawyers and other outside professional advisors; IT systems, support and hosting service providers; data storage and cloud providers and similar third-party service providers that assist us in carrying out the activities of our business.

Governmental and public authorities

Occasionally, K LW may be required to share personal information with governmental or other public authorities: (a) to comply with applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations; (f) to protect our rights, privacy, safety or property, and those of you or others; and (g) to allow us to pursue available remedies or limit our damages.

Other third parties

From time to time, we may share personal information with other third parties, e.g. when engaging in dialogue with your organisation's Human Resources department.

What about the privacy policies and practices of third parties?

Please note that K LW is neither individually nor jointly responsible for the policies and practices of other organisations or individuals, except to the extent that this is covered by any Data Processing Agreements it has in force with its Data Processors.

Although K LW asks its correspondents to use the information made available to them solely for purposes relating to K LW's recruitment activities, we do not control their use of any information that they have acquired from engaging with our services.

How do we deal with international transfers of data?

The personal information that you supply to us is stored on a database hosted within the European Economic Area (EEA).

However, owing to K LW's global recruitment activities, your personal information may be transferred outside the EEA, to countries where there may be a lower legal level of data protection. We will make you aware of this processing and will transfer the minimum amount of data necessary. We have in place Terms and Conditions that aim to ensure that third parties handle personal information in accordance with this privacy notice and European levels of data protection.

What do we do to keep your information safe and secure?

KLW takes the safety and security of your data seriously. We have controls in place to ensure that your data is made accessible only to authorised persons, and is not lost, accidentally destroyed, misused or inappropriately disclosed.

Our security measures include:

- engaging the services of a database hosting provider that is ISO27001 accredited;
- using systems and functionality that restrict access to personal information to those who are required to use it in the legitimate interests of our business;
- using encryption technologies when storing personal information on portable devices;
- employing up-to-date security software to protect our IT systems; and
- maintaining and applying an internal policy that sets out our approach to data security.

For how long do we keep and use your data?

KLW will continue to process your data for as long as this necessary to fulfil any contract. Otherwise, KLW will only process your data while it is in our legitimate interests to do this, and so long as these interests are not overridden by your data protection rights. The next section details your rights and how you can put them into practice.

What are your rights?

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require KLW to change incorrect or incomplete data;
- require KLW to delete or stop processing your data, where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where KLW is relying solely on its legitimate interests as the legal ground for processing; and
- ask KLW to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override KLW's legitimate grounds for processing data.

If you would like to exercise any of these rights, please email enquiries@klwrecruitment.com.

Please note that, if you ask us to stop processing your personal information, there may be times when we must continue to do so to fulfil a contract. For example, if KLW successfully places a job-seeker with your organisation, we may need to include your name and work address on an invoice.

What if our privacy information changes?

In order to keep this privacy information up-to-date, we reserve the right to make changes to it at any time to take account of changes in our business and legal requirements. We will publish updated versions on our website and will indicate the revision date at the top each iteration.