

If you have come to this page because you would like to access your marketing preferences please use the links provided in one of the emails sent to you.

The Saltwater Project Limited (“Saltwater”, “We” or “us”) are committed to protecting and respecting your privacy.

This Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a new regulation which replaces the Data Protection Regulation (Directive 95/46/EC). The Regulation aims to harmonise data protection legislation across EU member states, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

Even though the UK has expressed its intention to leave the EU in October 2019, the GDPR is applicable in the UK from 25th May 2018. The Government intends for the GDPR to continue in UK law post Brexit and has also introduced a Data Protection Bill to replace the current Data Protection Act in due course.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

**For the purposes of data protection legislation in force from time to time the data controller is SALTWATER of 3 Queen Street, London, W1J 5PA, United Kingdom. Our nominated representatives can be contacted at [info@thesaltwaterproject.com](mailto:info@thesaltwaterproject.com), with the subject header ‘GDPR’**

#### **Who we are and what we do.**

This Privacy Policy explains what we do with your personal data, whether we are in the process of helping you find a job, continuing our relationship with you once we have found you a role, providing you with a service, receiving a service from you, using your data to ask for your assistance in relation to one of our candidates, or you are visiting our website.

We are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 (our business). We also provide advisory and consulting services. We collect the

personal data of the following types of people to allow us to undertake our business:

- Prospective and placed candidates for permanent or interim roles;
- Prospective and live client contacts;
- Supplier contacts to support our services;
- Employees, consultants, temporary workers;
- Website Users;
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We collect information about you to carry out our core business and ancillary activities.

### **Information you give to us or we collect about you.**

This is information about you that you give us by filling in forms on our website [www.thesaltwaterproject.com](http://www.thesaltwaterproject.com) or by corresponding with us by phone, email or otherwise. It includes information you provide when you register to use our site, to enter our database, subscribe to our services, attend our events, participate in discussion boards or other social media functions, enter a competition, promotion or survey.

The information you give us or we collect about you may include your name, address, private and corporate email address and phone number, financial information (where we need to carry out financial background checks), employment history, emergency contacts, compliance documentation and references verifying your qualifications and experience and your right to work in the United Kingdom, curriculum vitae and photograph, links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website. Where appropriate and in accordance with local laws and requirements, we may also collect information related to your health, diversity information or details of any criminal convictions.

### **Information we collect about you when you visit our website.**

With regards to each of your visits to our website we will automatically collect some or all of the following information if you are already on Saltwater's database, otherwise this information will only be collected when you subscribe to communications, register for an account, apply to job applications or use other website services:

Technical information, including but not limited to Contact ID, First Name, Last Name, email address, Postal Code, City, Country, SMS Message, Uploaded CV, Number of Pageviews, Average Pageviews, Time of First Visit,

Time of Last Visit, LinkedIn Bio, Subscriptions to future communications, Mobile Phone Number, IP Address, IP City, Country & Code, LinkedIn Clicks, State/Region, IP State Code/Region Code, Street Address, Twitter Bio, Twitter Clicks, LinkedIn Connections, Salutation, IP State/Region, Website URL, Job Title, Twitter Username, Twitter Profile Photo, If you are interested in Saltwater services for your organisation, Company Name, IP Timezone, Fax Number, Number of Employees, Associated Company, browser type and version and any phone number used to call our offices.

Please note that the level of information collected on visiting our website depends largely on the level of interaction you have had with our site, if you have registered with us, subscribed or applied to jobs, services and marketing material, or are already registered with Saltwater through other means then more information may be collected.

#### **Information we obtain from other sources.**

This is information we obtain about you from other sources or third parties such as LinkedIn, corporate websites, job board websites, online CV libraries, your business card, personal recommendations and other limited sources (e.g. online and offline media). will inform you by sending you this Privacy Policy, within a maximum of 30 days of collecting the data, that we hold personal data about you, the source the personal data originates from and whether it came from publicly accessible sources and for what purpose we intend to retain and process your personal data.

We are working closely with third parties including business partners, sub-contractors in technical, professional, payment and other services, advertising networks, analytics providers, search information providers, credit reference agencies, professional advisors or payroll provider. We may receive information about you from them for the purposes of our recruitment services and ancillary support services.

#### **Purposes of the processing and the legal basis for the processing**

We've listed below various ways in which we may use and process information held about you, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive: To carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us and to provide you with the information, products and services that you request from us or we think will be of interest to you because it is relevant to your career or to your organisation.

To provide you with information about other services we offer, that are similar to those that you have already purchased, been provided with or enquired about.

The core service we offer to our candidates and clients is the introduction of candidates to our clients for the purpose of helping secure employment or finding other work roles that might be suitable for you through interim or permanent engagement. However, our service expands to supporting individuals throughout their career and to supporting businesses' resourcing needs and strategies. The more information we have, the more bespoke we can make our service.

Our legal basis for the processing of personal data is our legitimate business interests, described in more detail below, although we will also rely on contract, legal obligation and consent for specific uses of data.

We will rely on contract if we are negotiating or have entered into a placement agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation. We will rely on legal obligation if we are legally required to hold information on you to fulfil our legal obligations.

We will, in some circumstances, rely on consent for particular uses of your data and you will be asked for your express consent, if legally required. An Example of when consent may be the lawful basis for processing include permission to introduce you to a client (if you are a candidate).

### **Our Legitimate Business Interests**

Our legitimate interest in collecting and retaining your personal data is described below:

As a recruitment business and recruitment agency we introduce candidates to clients for permanent employment, interim worker placements or independent professional contracts. The exchange of personal data of our candidates and our client contacts is a fundamental, essential part of this process.

In order to support our candidates' career aspirations and our clients' resourcing needs we require a database of candidate and client personal data containing historical information as well as current resourcing requirements.

To maintain, expand and develop our business we need to record the personal data of prospective candidates and client contacts.

### **Consent**

Should we want or need to rely on consent to lawfully process your data we will request your consent orally, by email or by an online process for the specific activity we require consent for and record your response on our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.

### **Other uses we will make of your data:**

- Use of our website;
- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer.

### **We will use this information:**

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

We do not undertake automated decision making or profiling. We do use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision-making process. If automated decision making or profiling is to be used in the future to better help us provide our services to you then this information will be made available here so please check back frequently to see any updates or changes to our privacy Policy.

## Cookies

What are cookies and how do we use them?

- A "cookie" is a small piece of data that is stored on your computer's hard drive. They are used by nearly all websites and do not harm your system. We can use the information from cookies to ensure we present you with options tailored to your preferences on your visit to our website. We can also use cookies to analyse traffic and for advertising purposes.
- If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.
- Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies our website uses and the purposes for which we use them please see the below:
  - Cookies and Privacy
- If you don't want to receive cookies that are not strictly necessary to perform basic features of our site, you may choose to opt-out by changing your browser settings.
- Most web browsers will accept cookies but if you would rather we didn't collect data in this way you can choose to accept all or some, or reject cookies in your browser's privacy settings. However, rejecting all cookies means that you may not be able to take full advantage of all our website's features. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.
- For more information generally on cookies, including how to disable them, please refer to [aboutcookies.org](http://aboutcookies.org). You will also find details on how to delete cookies from your computer.

## Disclosure of your information inside and outside of the EEA

We will share your personal information with:

Any member of our group both in the EEA and outside of the EEA.

Selected third parties including:

- clients for the purpose of introducing candidates to them;
- candidates for the purpose of arranging interviews and engagements;
- clients, business partners, suppliers and sub-contractors for the performance and compliance obligations of any contract we enter into with them or you;

- subcontractors including event organisers, payment and other financial service providers.
- analytics and search engine providers that assist us in the improvement and optimisation of our site;
- credit reference agencies, our insurance broker, compliance partners and other subcontractors for the purpose of assessing your suitability for a role where this is a condition of us entering into a contract with you.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If Saltwater or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Use or terms and conditions of supply of services Terms of Business and other agreements; or to protect the rights, property, or safety of Saltwater, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

The lawful basis for the third party processing will include:

- Their own legitimate business interests in processing your personal data, in most cases to fulfil their internal resourcing needs;
- satisfaction of their contractual obligations to us as our data processor;
- for the purpose of a contract in place or in contemplation;
- to fulfil their legal obligations.

### **Where we store and process your personal data**

Saltwater is an international organisation, and this is what enables us to offer the range of services that we do. In order for us to continue operating in this way, we may have to transfer or store your data internationally.

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may be transferred to third parties outside of the EEA for the purpose of our recruitment services. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged

in, among other things, our recruitment services and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. Saltwater will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy Policy. All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted [using SSL technology]. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

### **How we safeguard your personal data**

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 to our website from you; and any transmission is at your own risk. Once we have received your information, we are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access.

We will use a range of appropriate technical and organisational measures, strict procedures and security features to try to prevent unauthorised access or a data breach.

If you suspect any misuse or loss of or unauthorised access to your personal information, please let us know immediately at [info@thesaltwaterproject.com](mailto:info@thesaltwaterproject.com). Furthermore, any data security breach should be reported to us so that action can be taken to protect affected individuals and to ensure that lessons are learned to minimise the risk of recurrence.

### **Retention of your data**

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate business interests and that you are happy for us to do so.

We will delete your personal data from our systems if we have not had any meaningful contact with you (or, where appropriate, the company you are working for or with) for two years (or for such longer period as we believe in good faith that the law or relevant regulators require us to preserve your data). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected.

The criteria we use to determine whether we should retain your personal data includes:

- the nature of the personal data;
- its perceived accuracy;
- our legal obligations;
- last date of communication or activity;
- whether an interview or placement has been arranged; and
- our recruitment expertise and knowledge of the industry by country, sector and job role.

We may archive part or all of your personal data or retain it on our financial systems only, deleting all or part of it from our main Customer Relationship Manager (CRM) system. We may pseudonymise parts of your data, particularly following a request for suppression or deletion of your data, to ensure that we do not re-enter your personal data on to our database, unless requested to do so.

For your information, Pseudonymised Data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms.

### **Your rights**

You have the right to ask us not to process your personal data for marketing purposes. We do not sell or disclose your personal data to third parties outside our group and we will only disclose your personal data if we are legally required to do so

You can exercise your right to accept or prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right to remove consent at any time by contacting us at [info@thesaltwaterproject.com](mailto:info@thesaltwaterproject.com).

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

**The GDPR provides you with the following rights:**

- **Right to be informed**, the right to be provided with a minimum set of information concerning the purposes for which the personal data we hold about you will be processed. As explained in this policy.
- **Right to access** the personal information that we hold about you. This enables you to have access/visibility to your data.
- **Right to rectification** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Right to erasure (the "right to be forgotten")** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **Right to object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Right to restrict processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Right to data portability** of your personal information to another party in certain formats, if practicable.
- **Make a complaint** to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: <https://ico.org.uk/concerns/>

**Access to information**

The Data Protection Act 1998 and the GDPR give you the right to access information held about you. We also encourage you to contact us to ensure your data is accurate and complete.

Your right of access can be exercised in accordance with the Act (and the GDPR once it is in force). Prior to 25th May 2018 any access request under the Data Protection Act will be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

A subject access request should be submitted to [info@thesaltwaterproject.com](mailto:info@thesaltwaterproject.com). No fee will apply once the GDPR comes into force.

### **Changes to our privacy policy**

Any changes we make to our privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy Policy.

### **Contact**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [info@thesaltwaterproject.com](mailto:info@thesaltwaterproject.com).