

## PRIVACY POLICY

Edison Smart (a trading name of Edison Search Ltd) respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

### IMPORTANT INFORMATION AND WHO WE ARE

#### PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Edison Smart collects and processes your personal data through your use of this website, including any data you may provide through this website when you register as a candidate or search and apply for jobs. This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice that we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

#### CONTROLLER

Edison Smart (a trading name of Edison Search Ltd) is the controller and responsible for your personal data (collectively referred to as "Edison Smart", "we", "us" or "our" in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

#### CONTACT DETAILS

Our full details are: Edison Smart

Data Privacy Manager: Hannah Chapman

Email address: [GDPR@edisonsmart.com](mailto:GDPR@edisonsmart.com)

Postal address:

Edison Smart  
ENI House  
Basing View  
Basingstoke  
UK  
RG21 4YY

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

#### **CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

This version was last updated on 1<sup>st</sup> August 2025.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

#### **THIRD-PARTY LINKS**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

#### **THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Contact data** including name, email address
- **Device and browser data**, such as IP address, information about your device and browser settings
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Where we collect or process any other categories of personal data (including sensitive personal data) about you that is not listed above, we will send you a separate Privacy Notice regarding the processing of such data by us.

#### **IF YOU FAIL TO PROVIDE PERSONAL DATA**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

#### **HOW IS YOUR PERSONAL DATA COLLECTED?**

We may collect data about you when you register with us, visit our website, apply for a job or when we communicate by email, SMS, phone or in person.

We use different methods to collect data from and about you from third parties:

- jobs boards/aggregators, such as Edison Smart Website, Career Builder, CW Jobs, Cyber Security Jobsite, Electronics Weekly, Google, ICT Jobs Belgium, Indeed, JobServe, Jobsite, Monster, OpenWeb, Reed, TalentBin, Idibu, Freelancer Map
- social media and networking platforms, such as LinkedIn; Viadeo, Facebook, Instagram, Github, StackOverflow, Behance, Elance, about.me, Pinterest, Kaggle, weibo, G+
- analytics providers such as Google and Yesware based outside the EU
- advertising networks such as Google
- search information providers such as Google, Hunter, Lusha, Zoominfo, Contact Out; based outside of the UK
- publicly available sources such as Companies House and the Electoral Register based inside the EU

#### **HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- Where we need to comply with a legal or regulatory obligation

#### **MARKETING**

We would like to use your contact details to contact you about news and information which we think may be of interest to you.

You may also receive marketing communications from us if you have previously requested information or services from us and you did not opt out of receiving marketing communications from us at the time.

You have the right to unsubscribe at any time, by notifying us by email of your intent to unsubscribe.

### **JOB ALERTS**

We may use your personal data to send you automated job alerts with information about roles that may be of interest to you if you have asked us to do so.

You have the right to unsubscribe to automated job alerts at any time, by notifying us by email of your intent to unsubscribe.

### **THIRD-PARTY MARKETING**

We will get your express opt-in consent before we share your personal data with third parties for marketing purposes.

### **CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below.

Your personal information will be processed by our staff and our subcontractors (including IT providers) and will be provided to appropriate third parties such as potential hirers and intermediaries in order to provide you with work-finding services. Please let us know if you do not want your personal information to be disclosed to a particular third party or category of third parties.

We may also share your personal details with your previous or current employers or other third parties identified by you to us as potential referees.

We may be required by law to share certain categories of your personal data with tax authorities and other government agencies.

We may use a third-party organisation to operate our payroll, check references and check employment history. We will need to provide them with certain categories of your personal data and they will be under an obligation to process it as instructed by us and in accordance with relevant data protection legislation. We may also need to provide certain categories of personal data to your pension provider, if appropriate.

We may also share your personal data with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We will not share your personal data with any other organisation unless it is necessary and in connection with providing our work-finding and recruitment services.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **INTERNATIONAL TRANSFERS**

Your personal data will be stored within the European Economic Area (EEA) on either local or cloud-based servers and will be subject to technical and organisation safeguarding protection measures. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

Some categories of data may be transferred outside the EEA if it is necessary. We will take all reasonable steps to ensure that your data is subject to the same protection as that provided by the EU and that it is subject to technical and organisation safeguarding protection measures as follows:

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#), or;

We will only transfer your personal data to organisations outside the EEA with whom we have entered into an agreement containing specific contract clauses approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We will only transfer personal data to a third party if they agree to comply with those procedures and policies or put in place adequate measures prior to receiving it. Maintaining data security means guaranteeing the confidentiality, integrity and availability (for authorised purposes) of the personal data.

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

## **DATA RETENTION**

### **FOR HOW LONG WILL YOU USE OR RETAIN MY PERSONAL DATA?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

By law we have to keep certain information about candidates for between 1 and 7 years. Where we have entered into a contract with you, we may also need to retain data for up to 7 years in order to ensure that we can meet our contractual obligations to you.

As a general rule, if you have been placed by us, we will not retain any of your data for more than 7 years from the date of registration or the date of last placement (whichever is later) unless we have continued to have meaningful contact with you over the preceding 2 years.

If you have not been placed by us, we will not keep your data for more than 2 years from the date of registration or the date when we last had meaningful contact with you (whichever is later).

### **YOUR LEGAL RIGHTS**

Under the Data Protection Act 2018, you have the right to find out what information the government and other organisations store about you. These include:

1. The right to access – You have the right to request copies of your personal data
2. The right to rectification – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request that we complete the information you believe is incomplete
3. The right to erasure – You have the right to request that we erase your personal data, under certain conditions
4. The right to restrict processing – You have the right to request that we restrict the processing of your personal data, under certain conditions
5. The right to object to processing – You have the right to object to our processing of your personal data, under certain conditions
6. The right to data portability – You have the right to request that we transfer the data that we have collected to another organisation, or directly to you, under certain conditions

If you wish to exercise any of the rights set out above, please contact us at: [GDPR@edisonsmart.com](mailto:GDPR@edisonsmart.com)

### **NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a fee if requests are repeated or obviously excessive.