



## **Evolve AI Ltd Privacy Policy**

### **Last Updated: 1st September 2020**

This Privacy Policy applies to information that Evolve AI Ltd, and any parents, subsidiaries and affiliate entities worldwide (individually and collectively referred to herein as the “Evolve”, “we,” “us” or “our”) collects about you on or via [evolveai.co.uk](http://evolveai.co.uk) (or any subdomain), or one of our other websites, applications or other services from which you are accessing this Privacy Policy (each referred to herein as a “Site,” and collectively, the “Sites”). This Privacy Policy describes how we collect such information, how we use it and to whom and under what circumstances we may disclose it.

Evolve AI Ltd T/A Evolve AI (Evolve AI Ltd - individually and collectively referred to herein as the “Evolve”, “we,” “us” or “our”) is a recruitment and headhunting business which provides work-finding services to its clients and work-seekers, advisory services and events to candidates and businesses looking to hire and scale their organisations. We must process personal data (including sensitive personal data) so that we can provide these services – in doing so, we act as a data controller.

This Privacy Notice (“Notice”) explains who we are, how we collect, share, and use personal information, and how you can exercise your privacy rights.

You may give your personal details to us directly, such as on an application or registration form or via our website or chatbot, or we may collect them from another source such as a job board, LinkedIn, referral or event registration. We must have a legal basis for processing your personal data. For the purposes of providing you with work-finding or recruitment services, and/or information relating to roles or candidates relevant to you we will only use your personal data in accordance with the terms of the following statement.

#### **COLLECTION AND USE OF PERSONAL DATA**



We will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with work-finding or recruitment services, advisory services or the opportunity to attend our industry events. These purposes include for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities and therefore sharing your data with our clients, arranging payments to you and developing and managing our services and relationship with you and our clients. In some cases, we may be required to use your data for the purpose of investigating, reporting and detecting crime and also to comply with laws that apply to us. We may also use your information during the course of internal audits to demonstrate our compliance with certain industry standards.

## **DATA WE MAY STORE**

### **Candidate Data**

If you provide information to us: As a Candidate of Evolve, you may provide personal information to us, for example, when you email your CV or information to an Evolve consultant, speak with an Evolve consultant, or communicate with us in any way in connection with our Services. We may from time to time receive information about you from other sources, or find your information on publicly available mediums or social media sites. (Linkedin for example, or job boards)

You are not obliged to provide us with any information or participate in any of the Services we offer, so we will assume that any information we collect directly from you has been provided voluntarily. If you do not provide us with certain information that is key to us providing our services to you as either a candidate or client, then we may be hindered in providing those services

## **The information we usually collect for Candidates will include:**

- Contact details: name, e-mail address, home address, telephone number.
- CV details: contact details, employment history, educational history, professional qualifications, other skills and activities
- Identification data: Passport, right to work, visas etc...
- Lifestyle preferences and personality profile, competencies, skills and references
- Work Seeking preferences, salary details etc...
- Health, diversity, and criminal conviction information
- A record of your marketing preferences and our communication history with you.

## **Information we collect from third party sources about Candidates:**

We may collect any of the above information from alternative sources. In these instances, we will do everything possible to ensure that such third parties are upholding their obligations under data protection laws.

We may obtain your personal information from sources or referees who disclose information about you, publicly available third-party sources such as LinkedIn, Job Boards or publicly available data sources and third party providers such as Beauhurst or Seamless.

## **Client and Prospect Data**

As a client or prospective client of Evolve, we need to collect and store information about your organisation or individuals in your organisation to enable us to provide services to you.

We will generally only need to store your contact details and job title to ensure we are providing a positive service to you and your organisation. We will keep a record of our communication with you.

## **Information we collect from third parties.**

We may gather information about you as a client or prospective client from 3rd party data providers and market research bodies and will store and process that data where we see a legitimate interest in us extending the offer of our services to you based on that information. We may also find your data on publicly accessible social media channels such as LinkedIn.

## **Referee Data**

In securing a reference from you about one of our Candidates, we may process your contact details (such as name, email address, and telephone number). We may also process certain professional details (such as your job title, occupation, academic and professional qualifications, and employment history) and your connection to the Candidate (such as your relationships to, experience with, and opinions about the relevant Candidate). We generally ask the Candidates to provide us with much of this information, but we may supplement it with information we collect about you from publicly available sources (such as LinkedIn) or by asking you directly.

## **WHAT DO YOU WE DO WITH YOUR PERSONAL INFORMATION?**

We may use the data we collect in a number of ways:

### **Candidate Data:**

In the provision of work-finding services: In order to provide you as a candidate with work-finding or recruitment services, including contacting you about opportunities relevant to your career preferences and sending your information to our clients with your permission.

**Marketing:**

According to your marketing preferences, we may send you information including newsletters, event invites, relevant job opportunities, research, white papers etc...that we think might be interesting to you.

**Client Data:**

To provide recruitment, headhunting or advisory services to you or your organisation.

Marketing: To send you relevant information about industry trends, newsletters, event invites, white papers etc...that we think may be interesting. We will always respect your marketing preferences

**SHARING OF INFORMATION:**

We may share your personal information with the following types of third parties for the purposes of providing our services:

- Any group companies or employees of Evolve. Your data is held on our secure database, which is only accessible by our employees.
- We may share your information with a law enforcement body, regulatory or government agency, court or other third party where it is a matter of law or legal obligation
- In the case of Candidates and referees, we may share your information with Clients who will need to process your information for the purposes or completing the services you have asked us to provide on your behalf
- If you are a candidate, we may share your information with a referee who you have given us permission to contact on your behalf
- We may share your information with third party service providers who perform functions on our behalf including payment providers, screening providers and professional advisers, such as lawyers, auditors, accountants, technical support providers, outsourced IT and document storage providers.

- We may share your information with our marketing partners to send emails on our behalf.
- We may share information with any other person with your specific consent.

### **OUR REASONS FOR PROCESSING YOUR DATA**

We will normally collect personal information from you where the processing is in our legitimate interests and there is no harm to your data protection interests or fundamental rights and freedoms.

If required by law, we may collect and process sensitive personal data, only if have your specific consent

### **Overseas Transfers**

We may transfer only the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with work-finding services. We will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

### **Data retention**

We will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time. The Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services. We must also keep your payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation.

Where we have obtained your consent to process your personal and sensitive personal data, we will do so in line with our retention policy. Upon expiry of that period of time we will seek further consent from you. Where consent is not granted we will cease to process your personal and sensitive personal data.

## **OUR WEBSITE AND OTHER ELECTRONIC COMMUNICATIONS**

### **AUTOMATICALLY COLLECTED SITE USAGE DATA**

To facilitate the operation of a website, certain information is collected automatically from or about you in connection with your visit to the website or the device you are using to access the website. Servers may automatically gather site usage information (for example your IP address, information about your web browser, your device, your location (subject to consent), shopping, browsing and other such activities).

### **COOKIES AND SIMILAR TECHNOLOGIES**

Like many companies, we (and our service providers) use cookies and other similar technologies to collect, store and track information about your Site usage. This information helps us to provide, operate, improve and personalise our Sites.

### **WHAT ARE COOKIES**

Cookies are small files of letters and numbers. These files are stored on the hard drive of the device you are using, be it a PC, mobile phone, or tablet. These letters and numbers are used to allow a website to remember certain bits of information, so that the user experience can be improved next time you visit.

By using our website you agree that we may store and access cookies on your device in accordance with this Privacy Policy.

## **HOW WE USE COOKIES**

When you visit our website it is likely we will create cookies which are stored on your device. For the duration of your 'session' on our website these cookies help us to deliver the correct information and ensure you only have to enter required information once, thereby improving your browsing experience.

We also use web analytics to understand how many people have visited our website, what they have looked at and how they found us etc. This gives us a better understanding of how our website is working. All data accrued cannot be used to identify personal information and merely gives us a general idea of how our website performs.

This overview of the type of cookies we use is based on categories outlined by the International Chamber of Commerce, in the ICC UK Cookie Guide. Some cookies may appear in multiple categories.

### **Category 1: strictly necessary cookies**

These cookies are necessary for the website to function. By disabling these cookies, some aspects of a website will either not work, or not work properly, such as secure logins, location services, and e-commerce functionality.

### **Category 2: performance cookies**

These cookies gather information to help improve the day to day performance of a website. By analysing data collected we can enhance popular pages, fix bugs and error messages etc. All data is based on totals and averages and is strictly anonymous. For example we use Google Analytics, which creates several first-party cookies. The data that Google collects is kept strictly private and confidential and won't be shared with anyone else. We don't feel that Google Analytics is a breach of privacy as we are merely aggregating the data survey. The information that is collected is used to understand website trends and performance.

### **Category 3: functionality cookies**

These are cookies which provide a 'memory' for the website, this enables the website to remember any personal choices you make (for example, your username, language or geographic location). A website may provide local weather reports, traffic updates and other similar localised information. These cookies are also used to remember changes you may make to text sizes, fonts and other customisable elements of the website. The information these cookies collect may be made anonymous and can't track activity on other websites.

### **Category 4: targeting cookies or advertising cookies**

We nurture the use of social media websites and believe sharing is a key part of how people access new information. Social media networks are a popular way of doing this. To enable people to share information via popular social media, our website may have functionality allowing this type of activity.

The owners of social media websites may place cookies on users' devices and they will have their own cookie policies. We have no control over these companies' cookies policies.

### **HOW TO TURN OFF COOKIES**

Most web browsers enable you to decline or block cookies (check the "Help" or "Settings" menus of your browser to learn more). It is your right to decline cookies however doing so may disable certain features within our website(s) and compromise your experience.

### **THIRD-PARTY WEBSITES**

The Sites may contain links (which may take the form of hyperlinks, widgets, clickable logos, plug-ins, images or banners) to websites and services operated by entities other than us.

This Privacy Policy does not apply to such other websites or services, so we recommend that you review and understand the individual privacy policy of any such third-party website.

## **YOUR RIGHTS**

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data we process on you;
- The right of access to the personal data we process on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- Where you have consented to the us processing your personal data and / or sensitive personal data you have the right to withdraw that consent at any time by contacting Loren Bowden, DPO, at [info@evolveai.co.uk](mailto:info@evolveai.co.uk)

There may be circumstances where we will still need to process your data for legal or official reasons. We will inform you if this is the case. Where this is the case, we will restrict the data to only what is necessary for the purpose of meeting those specific reasons.

If you ask us to remove your data from our secure database, we may still contact you in future should we find your details on a publicly accessible forum or social media website such as LinkedIn or a Job Board

If you believe that any of your data that we process is incorrect or incomplete, please contact us using the details above and we will take reasonable steps to check its accuracy and correct it where necessary.

You can also contact us using the above details if you want us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.

### **COMPLAINTS OR QUERIES**

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: Loren Bowden – DPO – [privacy@evolveai.co.uk](mailto:privacy@evolveai.co.uk)

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.