

The Social Partner Privacy policy

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INTRODUCTION

This Privacy Policy explains what we do with your personal data, whether we are in the process of providing you with a service, receiving a service from you, using your data to ask for your assistance, or you are visiting our website.

It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

This Privacy Policy applies to the personal data of our Website Users, Contacts, Clients, Suppliers, and other people whom we may contact in order to deliver our work. It also applies to our Staff.

For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the "[GDPR](#)"),

the company responsible for your personal data is "The Social Partner (TSP)", under legal registration name The Social Partner S.à.r.l | CHE-269.353.594

It is important to point out that we may amend this Privacy Policy from time to time. Please just visit this page if you want to stay up to date, as we will post any changes here.

If you are dissatisfied with any aspect of our Privacy Policy, you may have legal rights and, where relevant, we have described these as well.

This Privacy Policy applies in relevant countries throughout our international network. Different countries may approach data privacy in slightly different ways and so we also have country-specific parts to this Privacy Policy. You can find country-specific terms for your jurisdiction [here](#). This allows us to ensure that we're complying with all applicable data privacy protections, no matter where you are.

WHAT KIND OF PERSONAL DATA DO WE COLLECT?

CLIENT DATA: If you are a TSP customer, we need to collect and use information about you, or individuals at your organisation, in the course of providing you services providing you with consulting or similar services or notifying you of content published by TSP which is likely to be relevant and useful to you .

To the extent that you access our website we will also collect certain data from you..

SUPPLIER DATA: We need a small amount of information from our [Suppliers](#) to ensure that things run smoothly. We need contact details of relevant individuals at your organisation so that we can communicate with you. We also need other information such as your bank details so that we can pay for the services you provide (if this is part of the contractual arrangements between us). .

PEOPLE WHOSE DATA WE RECEIVE FROM CONTACTS AND STAFF, SUCH AS REFEREES: In order to provide our services, we need some basic background information about potential prospects. We only ask for very basic contact details, so that we can get in touch with you for a reference.

WEBSITE USERS: We collect a limited amount of data from our [Website Users](#) which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, and the times that our website is most popular.

A number of elements of the personal data we collect from you are required to enable us to fulfil our contractual duties to you or to others. Depending on the type of personal data in question and the grounds on which we may be processing it, should you decline to provide us with such data, we may not be able to fulfil our contractual requirements or, in extreme cases, may not be able to continue with our relationship.

HOW DO WE COLLECT YOUR PERSONAL DATA?

There are two main ways in which we collect your personal data:

- Directly from you; and
- From third parties (e.g. our [Contacts](#)) and other limited sources (e.g. online and offline media).

To the extent that you access our website or read or click on an email from us, we may also collect certain data automatically or through you providing it to us. We collect your data automatically via cookies when you visit our website, in line with cookie settings in your browser. We will also collect data from you when you contact us via the website, for example by using the chat function.

HOW DO WE USE YOUR PERSONAL DATA?

The main reason for using your personal details is to provide our services to the right person at the right time, to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly. The more information we have, the more bespoke we can make our service. Where appropriate and in accordance with local laws and requirements, we may also use your personal data for things like marketing, profiling and diversity monitoring. Where appropriate, we will seek your consent to undertake some of these activities.

WEBSITE USERS: We use your data to help us to improve your experience of using our website, for example by analysing your recent services and solutions search criteria to help us to present offers to you that we think you'll be interested in. If you are a [Client](#) of TSP, we may use data from your use of our websites to enhance other aspects of our communications with, or service to, you.

WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We may share your personal data with various parties, in various ways and for various reasons. Unless you specify otherwise, we may also share your information with any of our group companies and associated third parties such as our service providers where we feel this will help us to provide you with the best possible service.

WEBSITE USERS: Unless you specify otherwise, we may share your information with providers of web analytics services, marketing automation platforms and social media services to make sure any advertising you receive is targeted to you.

HOW DO WE SAFEGUARD YOUR PERSONAL DATA?

We care about protecting your information. That's why we put in place appropriate measures that are designed to prevent un-authorized access to, and misuse of, your personal data.

HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

If we have not had meaningful contact with you (or, where appropriate, the company you are working for or with) for a period of two years, we will [Delete](#) your personal data from our systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation).

HOW CAN YOU ACCESS, AMEND OR TAKE BACK THE PERSONAL DATA THAT YOU HAVE GIVEN TO US?

Even if we already hold your personal data, you still have various rights in relation to it. To get in touch about these, please [contact us](#). We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

Right to object: If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases).

Right to withdraw consent: Where we have obtained your consent to process your personal data for certain activities (for example, for profiling your suitability for certain roles), or consent to market to you, you may withdraw your consent at any time.

Data Subject Access Requests (DSAR): You have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or [Delete](#) such information. At this point we may comply with your request or, additionally do one of the following:

we may ask you to verify your identity, or ask for more information about your request; and where we are legally permitted to do so, we may decline your request, but we will explain why if we do so.

Right to erasure: In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to "erase" your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If we do agree to your request, we will [Delete](#) your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. That way, we will minimise the chances of you being contacted in the future where your data are collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.

Right of data portability: If you wish, you have the right to transfer your data from us to another data controller.

Right to lodge a complaint with a supervisory authority: You also have the right to lodge a complaint with your local supervisory authority, details of which can be found [here](#).

If your interests or requirements change, you can unsubscribe from part or all of our marketing content (for example TSP newsletters) by clicking the unsubscribe link in the email, or by updating your preferences through an email sent to us, indicating your instruction to unsubscribe.

HOW DO WE STORE AND TRANSFER YOUR DATA INTERNATIONALLY?

TSP is interacting with global contacts but we do not have to transfer or store your data internationally. .

WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA ON THE TSP WEBSITE?

TSP controls the processing of personal data on its website(s).

WHAT ARE COOKIES AND HOW DO WE USE THEM?

A "cookie" is a bite-sized 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 use them to track your activity to help ensure you get the smoothest possible experience when visiting our website. We can use the information from cookies to ensure we present you with options tailored to your preferences on your next visit. We can also use cookies to analyse traffic and for advertising purposes.

How to reject cookies

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.

Annex 1

WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT?

- 1) Name;
 - 2) Contact details;
 - 3) Referee details;
 - 4) Age and Diversity information including racial or ethnic origin, religious or other similar beliefs, and physical or mental health, including disability-related information;
 - 5) Information on your interests and needs regarding future services or training interests
 - 6) Extra information that you choose to tell us;
 - 7) IP address;
 - 8) Email address
 - 9) Bank details
 - 10) The dates, times and frequency with which you access our services; and
- Please note that the above list of categories of personal data we may collect is not exhaustive.
 - **WEBSITE USERS:** We collect a limited amount of data from our [Website Users](#) which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as:
 - 1) how you use our website,
 - 2) the frequency with which you access our website,
 - 3) your browser type,
 - 4) the location you view our website from,
 - 5) the language you choose to view it in and
 - 6) the times that our website is most popular. If you contact us via the website, for example by using the chat function, we will collect any information that you provide to us, for example your name and contact details.

HOW DO WE USE YOUR PERSONAL DATA?

Having obtained data about you, we may then use it for Recruitment and Marketing Activities;

We collect data submitted by you or agencies on your behalf for job applications made to TSP

We may periodically send you information that we think you may find interesting,

We may use your data to enable us to develop and market other products and services, market our full range of services, send you details of reports, promotions, offers, networking and client events, and general information about the industry sectors which we think might be of interest to you;

We may display promotional excerpts from your details on TSP' website(s) as a success story (only where we have obtained your express consent to do so); and

We need your consent for some aspects of these activities which are not covered by our legitimate interests (in particular, the collection of data via cookies, and the delivery of direct marketing to you through digital channels) and, depending on the situation, we'll ask for this via an opt-in or soft-opt-in (which we explain further below). Soft opt-in consent is a specific type of consent which applies where you have previously engaged with us (for example by submitting a job application or CV, or registering a vacancy to be filled), and we are marketing other recruitment-related services. Under 'soft opt-in' consent, we will take your consent as given unless or until you opt out. For most people, this is beneficial as it allows us to suggest other jobs to you alongside the specific one you applied for, significantly increasing the likelihood of us finding you a new position. For other types of e-marketing, we are required to obtain your explicit consent.

COOKIES POLICY

What's a cookie?

A "cookie" is a piece of information that is stored on your computer's hard drive and which records your navigation of a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes.

Cookies are used by nearly all websites and do not harm your system. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings. We also provide information about this in our Marketing preferences page on the TSP website.

How do we use cookies?

We use cookies to do two things:

- to track your use of our website. This enables us to understand how you use the site and track any patterns that emerge individually or from larger groups. This helps us to develop and improve our website and services in response to what our visitors want and need; and
- to help us advertise jobs to you that we think you'll be interested in. Hopefully this means less time for you trawling through endless pages and will get you into the employment you want more quickly.

Cookies are either:

- **Session cookies:** these are only stored on your computer during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any information from your computer; or
- **Persistent cookies:** a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again. We use persistent cookies for Google Analytics and for personalisation (see below).

Cookies can also be categorised as follows:

- **Strictly necessary cookies:** These cookies are essential to enable you to use the website effectively, such as when applying for a job, and therefore cannot be turned off. Without these

cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.

- **Performance cookies:** These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.
- **Functionality cookies:** These cookies allow our website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customise. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymised.
- **Personalisation cookies:** These cookies help us to advertise details of potential job opportunities that we think may be of interest. These cookies are persistent (for as long as you are registered with us) and mean that when you log in or return to the website, you may see advertising for jobs that are similar to jobs that you have previously browsed.

CONSENT

In certain circumstances, we are required to obtain your consent to the processing of your personal data in relation to certain activities. Depending on exactly what we are doing with your information, this consent will be opt-in consent or soft opt-in consent.

Article 4(11) of the [GDPR](#) states that (opt-in) consent is "any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her." In plain language, this means that:

- you have to give us your consent freely, without us putting you under any type of pressure;
- you have to know what you are consenting to – so we'll make sure we give you enough information;
- you should have control over which processing activities you consent to and which you don't. We provide these finer controls within our privacy preference centre; and
- you need to take positive and affirmative action in giving us your consent – we're likely to provide a tick box for you to check so that this requirement is met in a clear and unambiguous fashion.

We will keep records of the consents that you have given in this way.

We have already mentioned that, in some cases, we will be able to rely on soft opt-in consent. We are allowed to market products or services to you which are related to the services we provide as long as you do not actively opt-out from these communications.