

# Privacy Policy



## Interfacio Ltd

[hello@interfacio.com](mailto:hello@interfacio.com) | + 44 208 986 5002 or from USA 1-800-578-0144

Interfacio is a specialist global recruitment and executive search business. We provide our services to Clients looking to recruit personnel for their businesses. Through our work with individuals and Candidates we also offer advice and guidance in relation to professional and career development.

We engage with many different types of people and this policy is relevant to you if you are either a prospective, current or placed Candidate; a prospective, current or previous Client; a website visitor, newsletter subscriber; Partner business or supplier; a referee; a coaching Client or an individual who has contacted us with general enquiries.

We take your personal data seriously. This policy explains our use of and approach to personal data shared with us including business contact details. It also explains how we use Candidate and Client personal data as well as personal data that is processed through our website.

### What personal data do we collect and why do we use it?

The table at the bottom of this notice explains who we collect personal data about, what that personal data is and the purpose we process it for.

### How long do we keep your personal data for?

#### Candidate data and Client contact details:-

We will keep your data for a maximum of 6 years and 6 months from the time of any previous contact. Typically, we may not hear from people for a length of time. For Candidates, after 12 months of no contact, we will attempt to get in touch with you to update the information we hold on you. If, after a period of 6 years and 6 months we have not maintained or re-established contact or gained up to date information from you, your data will be deleted.

We use a number of criteria for determining the retention period including obligations under law and consideration of the original purpose we collected the data for. For more information, you may request a copy of our Retention Policy.

### Who do we share your personal data with?

#### Candidates (Job Seekers):-

Your personal data may be shared with a Client who engages with us in their search for personnel, in the case of a specific or potential recruitment for which you are being considered, to ascertain if you are a good fit for the available position. Specific Candidate information will not be shared or published either on this site or directly in writing or verbally to any third party, including Client companies, without the prior agreement of the Candidate in question.

We only share data with Clients with whom we have a specific Data Sharing agreement.

#### Clients:-

Details relating to a particular vacancy or any other aspects relating to a Client company's business will not be advised or published without the prior agreement of the Client in question. In such cases, scope of publication shall be limited to the immediate parties involved, including prospective Candidates identified for consideration in relation to that particular vacancy or opportunity.

Data we hold is also shared with data processors such as our CRM provider Invenias, our IT support company Assits, and certain third-party marketing communication platforms including Survey Monkey and Constant Contact. In these cases, we have Data Processing Agreements in place and ensure reliable practices of Data Security are in place with these data processors.

### **What happens if you do not provide us with the information we request or ask that we stop processing your information?**

If you do not provide the personal data necessary, or ask us to stop processing your data, we may not be able to respond to your query or consider your application or request or to provide the relevant services to you.

### **Do we make automated decisions concerning you?**

No, we do not carry out automated profiling.

### **Do we transfer your data outside the UK and Europe?**

We may sometimes transfer your personal data to countries outside the UK and European Economic Area, for example if we are either using a supplier or working with a Client based elsewhere. You can find the list of European member states by clicking on the following link: [https://europa.eu/european-union/about-eu/countries/member-countries\\_en](https://europa.eu/european-union/about-eu/countries/member-countries_en). The privacy laws in countries outside the European Economic Area and UK may be different from those in your home country.

At present we transfer personal data to the following countries outside the UK and EEA:

- U.S.
- New Zealand
- India
- Brazil
- Mexico
- Indonesia
- China
- Singapore
- Japan
- Argentina
- South Korea
- South Africa
- Australia
- Thailand
- UAE/GCC
- Canada
- Malaysia
- Hong Kong
- Israel

Where we transfer data to a country that has not been deemed to provide adequate data protection standards, we always have security measures and approved European model clauses or other adequate safeguards in place to protect your personal data. Please contact us if you would like more details about our safeguards for data transfers.

To find out more about how we safeguard your information as related to transfers contact us on: [dataprivacy@interfacio.com](mailto:dataprivacy@interfacio.com)

## What rights do you have in relation to your data that we hold?

You have a number of rights when it comes to your personal data. Further information and advice about your rights can be obtained from the data protection regulator in your country. In the UK this is the Information Commissioner.

### Rights

1. **The right to be informed**  
You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Policy. If you have any additional questions, for example regarding transfers and locations of data or our legitimate interests basis, do please get in touch.
2. **The right of access**  
You have the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this Privacy Policy). This is so you're aware and can check that we're using your information in accordance with data protection law.
3. **The right to rectification**  
You are entitled to have your information corrected if it's inaccurate or incomplete.
4. **The right to erasure**  
This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there's no compelling reason for us to keep holding it. This is not a general right to erasure; there are exceptions.
5. **The right to restrict processing**  
You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.
6. **The right to data portability**  
You have rights to obtain and reuse your personal data for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability. E.g your original CV.
7. **The right to object to processing**  
You have the right to object to certain types of processing, including processing for direct marketing (i.e. if you no longer want to be contacted with potential opportunities, or receive newsletters) or where we are relying on our legitimate interests for processing.
8. **The right to lodge a complaint**  
You have the right to lodge a complaint about the way we handle or process your personal data with your national data protection regulator.
9. **The right to withdraw consent**  
If you have given your consent to anything we do with your personal data, you have the right to withdraw that consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for marketing purposes.

We will usually act on requests that we receive in relation to personal data and provide information free of charge. We may charge a reasonable fee to cover our administrative costs of providing the information for:

- Baseless or excessive/repeated requests, or
- Further copies of the same information.

Alternatively, we may be entitled to refuse to act on the request.

Please consider your request responsibly before submitting it. We'll respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we'll come back to you and let you know.

### How will we contact you?

We may contact you by phone, email or social media. If you prefer a particular contact means over another please just let us know.

### How can you contact us?

If you are unhappy with how we have handled your information or have further questions on the processing of your personal data **and you are not based in the EU**, contact the person within our organisation responsible for data protection on [dataprivacy@interfacio.com](mailto:dataprivacy@interfacio.com).

EU Representative:

We are based in UK and as such under Article 27 of the GDPR we are required to provide a contact in the EU that will act as our representative **if you are based in the EU** and should you wish to contact us. You can contact our EU Representative to exercise your rights under the GDPR or to discuss any sort of data protection issue relating to our company. Our EU Representative is:

Company Name: Instant EU GDPR Representative Ltd  
 Email: [support@gdprteam.freshdesk.com](mailto:support@gdprteam.freshdesk.com)  
 Tel: + 353 015 549 700  
 Web: <https://interfacioltd.gdprlocal.com/eu>  
 EU Dublin Address:  
 INSTANT EU GDPR REPRESENTATIVE LTD, 69 Esker Woods Drive, Lucan, Co. Dublin, Ireland

For more information about your rights please refer to: <https://gdpr-info.eu/chapter-3/>

### What personal data do we collect and why do we use it?

The table below explains who we collect personal data about, what that personal data is and the purpose we process it for.

The last column sets out the 'lawful basis' we rely on for processing that personal data which is a requirement of data protection rules. Essentially, companies may only process personal data if they can identify a lawful basis from a list set out in the legislation.

	Personal Data	Source & Purpose	Lawful Basis for Processing
<b>Candidates (Jobseekers)</b>	Resume or CVs, educational records, work history, employment and references, contact details and sometimes salary information. If you are shortlisted as a Candidate, this may involve the processing of more detailed personal data including	We mainly collect this information directly from you during the recruitment, engagement and onboarding stages.  Sometimes we collect information from third parties such as an agent acting on your behalf such as an interim manager or from a third-party recommendation or a person giving a reference.	The processing is necessary for our legitimate interests of assessing suitability for potential roles, to find potential Candidates.  If you choose to give us special category data (listed in the second column), we obtain your

	<b>Personal Data</b>	<b>Source &amp; Purpose</b>	<b>Lawful Basis for Processing</b>
	sensitive data such as health information that you or others provide about you.	We do use some publicly available sources to find information about potential Candidates, specifically LinkedIn and company websites.	express consent to process that.
<b>Clients and potential Clients</b>	Contact details provided and correspondence. Contracts.	This information is given to us by you or from publicly available information (for example on your website).  It is used for us to fulfil contracts and engage in business discussions.	Our legitimate interests as a business in responding to and keeping a record of correspondence. Some information is also necessary for us to perform the contracted services.
<b>Website visitors</b>	Information from cookies. [For more details see our Cookie Notice.]	This information is collected via the cookies when you use our website.	We only install non-essential cookies with your consent. [For more details see our Cookie Notice.]
<b>Newsletter subscribers</b>	Name, Email address, Job Function, Home Country.	This information is given to us by you.	Our legitimate interests as a business in informing, responding to and keeping a record of correspondence.
<b>Partners or Suppliers</b>	Contact details and provided correspondence.	This information is given to us by you or from publicly available information (for example on your website). It is used for us to fulfil contracts and engage in business discussions regarding market developments and collaborative projects.	Our legitimate interests as a business in responding to and keeping a record of correspondence. Some information is also necessary for us to perform our contracted services
<b>References/ referees</b>	Contact details and correspondence.	Reference contact details may be given to us by Candidates as part of a recruitment process. Other personal data about referees is given to us by you directly.	Our legitimate interests as a business in obtaining references on Candidates.
<b>Coaching Clients (ie where you are a Client of ours we are providing coaching services to)</b>	Contact details, correspondence, assessments, information provided, analysis and recommendations and opinions. Special category information such as health, disability or ethnicity or racial information is only processed if provided by you.	This information is given to us by you.  Occasionally we undertake feedback sessions as part of coaching which may involve the provision of information about you from other people known to or nominated by you.  We use the information to provide our coaching services to you.	Our legitimate interests as a business in providing coaching services. Some information may also be necessary specifically for us to perform the contract.  We only process special category data with your express consent.

	<b>Personal Data</b>	<b>Source &amp; Purpose</b>	<b>Lawful Basis for Processing</b>
<b>Individuals who contact us with general queries</b>	Contact details provided and correspondence.	This information is given to us by you.  It is used to respond to the query and keep a record of it.	Our legitimate interests as a business in responding to and keeping a record of correspondence.

To ensure the necessity of processing and protection of our data subject's fundamental rights to privacy, we have carried out several balancing tests known as Legitimate Interest Assessments. If you would like to obtain the results and information from these balancing tests, this can be provided on request.

Your privacy and security are of utmost importance to Interfacio. Your email address and any other personal information that we hold will not be passed on or sold to any third party organisations, unless with your prior knowledge and consent. You can unsubscribe from our newsletter list at any time by clicking on the 'unsubscribe' link at the bottom of any email newsletter.