

Urban Jungle Recruitment Privacy Policy

Urban Jungle Services Ltd is a company registered in England and Wales (Companies House No. 10414152) at 20-22 Wenlock Road, London, N1 7GU (Registration No. ZA224996).

Urban Jungle Services Ltd ("We", "Us") are committed to protecting and respecting your privacy. This Privacy Notice (together with any other documents referred to herein) sets out the basis on which the personal data collected from you, or that you provide to Us, will be processed by Us in connection with Our recruitment processes. Please read the following carefully to understand Our views and practices regarding your personal data and how We will treat it.

For the purpose of the General Data Protection Regulation ("GDPR") ") and the version of the GDPR retained in UK law (the "UK GDPR") the Data Controller is Urban Jungle Services Ltd.

Where you apply for a job opening posted by Us, these Privacy Notice provisions will apply to Our processing of your personal information.

We may use an Applicant Tracking System to assist with Our recruitment process to process personal information as a data processor on Our behalf. The Applicant Tracking System is only entitled to process your personal data in accordance with Our instructions.

Where you apply for a job opening via the application function on a job site or similar online service provider ("Partner"), you should note that the relevant Partner may retain your personal data and may also collect data from Us in respect of the progress of your application. Any use by the Partner of your data will be in accordance with the Partner's Privacy Notice.

Your Personal Information

Information We collect from You

We collect and process some or all of the following types of information from you:

- Information that you provide when you apply for a role. This includes information provided through an online job site, via email, in person at interviews and/or by any other method.
- In particular, We process personal details such as name, email address, address, telephone number, date of birth, qualifications, experience, information relating to your employment history, skills and experience that you provide to Us, as well as your video in case you conduct your interview using the Video Interview feature.
- If you contact Us, We may keep a record of that correspondence.
- A record of your progress through any hiring process that we may conduct.
- Details of your visits to any Applicant Tracking System Website we use including, but not limited to, traffic data, location data, weblogs and other communication data, the site that referred you to the Applicant Tracking System Website and the resources that you access.



• Information related to our Diversity & Inclusion reporting, including your age, gender identity, ethnicity, sexual orientation and information on disability. This information can be voluntarily submitted by You after applying for a role and will be stored separately from Your candidate profile. This information will not include information that directly identifies You such as your name and email address. We will use this data for our internal Diversity reporting, or Diversity reports that we may publish. Reports will never be published with individual answers but as collated data. Diversity data can not be deleted if you send us a deletion request as this data is only stored in an anonymised and non-identifiable format.

Information We Collect From Other Sources

Third parties, for example an Applicant Tracking System may provide Us with the facility to link the data you provide to Us, with other publicly available information about you that you have published on the Internet – this may include sources such as LinkedIn and other social media profiles.

Third party providers such as Applicant Tracking Systems allow Us to search various databases – some publicly available and others not, which may include your personal data (including your CV or Resumé), to find possible candidates to fill Our job openings. Where We find you in this way we will obtain your personal data from these sources.

We may receive your personal data from a third party who recommends you as a candidate for a specific job opening or for our business more generally. The data we receive from the third party (for example recruitment agencies) may be uploaded into our Applicant Tracking System and processed according to this policy.

Uses Made Of Your Information

Lawful basis for processing

We rely on legitimate interest as the lawful basis on which We collect and use your personal data. Our legitimate interests are the recruitment of staff for Our business.

Where you apply for a job opening through third party providers, we may rely on your consent, which is freely given by you during the application process, to disclose your personal data to the third party provider on the basis described below.

Purposes of processing

We use information held about you in the following ways:

- To consider your application in respect of a role for which you have applied.
- To consider your application in respect of other roles.



- To communicate with you in respect of the recruitment process.
- To enhance any information that we receive from you with information obtained from third party data providers.
- To find appropriate candidates to fill Our job openings.
- To help our service providers (such as Applicant Tracking Systems and its processors and data providers) and Partners (such as the job sites through which you may have applied) improve their services.

Automated decision making/profiling

We may use an Applicant Tracking System to select appropriate candidates for Us to consider based on criteria expressly identified by us, or typical in relation to the role for which you have applied. The process of finding suitable candidates is automatic, however, any decision as to who We will engage to fill the job opening will be made by Our staff.

Disclosure of Your Information

As set out above, we pass your information to our third party service providers, including Applicant Tracking Systems, who use it only in accordance with our instructions and as otherwise required by law.

Where you have applied for a job opening through a third party service provider, We may disclose to the third party provider certain personal data that We hold, including but not limited to a unique identifier used by the service provider to identify you, and information about your progress through our hiring process for the applicable job opening, as well as tangible, intangible, visual, electronic, present, or future information that we hold about you, such as your name, contact details and other information involving analysis of data relating to you as an applicant for employment (collectively "Disposition Data").

The service provider shall be the data controller of this data and shall therefore be responsible for complying with all applicable law in respect of the use of that data following its transfer by Us.

How We store your Personal Data

Security

We take appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.



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

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 through any online means, therefore any transmission remains at your own risk.

Where We store your Personal Data

Where we store your personal data in our own systems, it is stored on our secure servers within the EEA.

The data that We collect from you and process using an Applicant Tracking System may be transferred to, and stored at, a destination outside the UK or the European Economic Area ("EEA"). It may also be processed by staff operating outside the UK or the EEA who work for Us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing and that you have satisfied yourself that you have read and understood any third party provider's privacy policies.

In particular, your data may be accessible to i)a third party provider's staff in the USA or EU or ii) may be stored by hosting service providers on servers in the USA as well as in the EU. The USA does not have the same data protection laws as the United Kingdom and EEA.

If you would like further information please contact Us (see 'Contact' below). We will not otherwise transfer your personal data outside of the United Kingdom OR EEA or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

How long we keep your Personal Data

If you have applied for a position, and we do not decide to progress the application any further beyond the application, your personal data will be deleted within 24 months.

If you have progressed to interview stages, then We may keep your information on file so that We may review your performance and progress in relation to any further or future applications with us.

Data on Diversity metrics that You may decide to submit will always be anonymised and will not be deleted with your candidate data.

Your rights

Under the <u>General Data Protection Regulation</u> and the UK GDPR, you have a number of important rights. Exercising these rights would normally be free of charge, however we reserved the right to charge a fee commensurate with our administration time if the requests are unfounded, excessive or repeated in nature. In summary, those include rights to:



- access to your personal data and to certain other supplementary information that this Privacy Notice is already designed to address
- require Us to correct any mistakes in your information which We hold
- require the erasure of personal data concerning you in certain situations. If you have decided to opt into our Diversity reporting, we will be unable to delete your Diversity data as this is only available in an anonymised format.
- receive the personal data concerning you which you have provided to Us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal data concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal data
- otherwise restrict our processing of your personal data in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the <u>Guidance from the UK Information Commissioner's Office (ICO) on individuals rights</u> under the UK GDPR.

If you would like to exercise any of those rights, please:

- contact us using our Contact details below
- let Us have enough information to identify you,
- let Us have proof of your identity and address, and
- let Us know the information to which your request relates.

How to complain

We hope that We can resolve any query or concern you raise about Our use of your information.

The <u>General Data Protection Regulation</u> and the UK GDPR also gives you the right to lodge a complaint with a supervisory authority, in particular (under the GDPR) in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at https://ico.org.uk/make-a-complaint or telephone: 0303 123 1113.



Contact

All questions, comments and requests regarding this Privacy Notice should be addressed to dataofficer@myurbanjungle.com.