# **Privacy Policy**

Avarn LP is a Data Controller in our capacity as your agent in respect of the personal data you supply to us. We share your data with third party Clients in order to advance your prospect of obtaining your desired position. The purpose of this document is to set out the privacy entitlements of data subjects, which are defined in the General Data Protection Regulation (GDPR) as natural (living) individuals.

The General Data Protection Regulation (GDPR) is a European Union Regulation that was enacted into Irish law under the Data Protection Act 2018. The GDPR sets out the data entitlements of data subjects and the obligations of those who process the personal data of data subjects. GDPR seeks to protect and enhance the rights of data subjects.

We have identified our data subjects as being:

- General candidates looking for temporary or permanent work.
- Individuals who are engaged on a contract of employment by our company to be placed in temporary assignments in our client companies.
- Individuals whom we introduce to companies and who provide contractual work to those companies
- Client contact details, those being the personal details in the form of the client contact email address and telephone number

## The information we collect and how we use it

Methods of data collection:

- Obtain personal data directly from you;
- Personal data that we receive from other sources; for example, any information that you provide by filling in forms on our website
- It is important that the personal data you provide is up to date and accurate. If personal data we hold on you is inaccurate or incomplete, please contact us and we will update the information.

#### Candidate Data:

Avarn LP collects and uses all Personal Information that you provide to deliver the job-seeking or related services you have requested. Your information will only be used for matching your skills with potential job opportunities and will be only disclosed to prospective employers that you are interested in. We may use the information:

- to consider your application for employment
- to notify you of our new employment opportunities
- to respond to your requests

- to improve our level of service
- to share your information with prospective employers to increase your chances of securing the job you want
- to share market knowledge and career information with you

#### Client Data:

Avarn LP collects and uses all Personal Information in accordance with the provisions of this policy and furtherance of our recruitment business. Your information will only be used to contact you in the following circumstances:

- to discuss potential requirements for our services
- to develop an understanding of the Clients organization and the Candidate profile requirements
- to discuss potential candidates for vacancies you have requested us to assist you in recruitment process
- to schedule candidate interviews
- to update you on candidates whose data we have shared with you and their progression in the process and on-boarding of successful candidates
- to share contact information with candidates who are actively interviewing with you.
- to share market knowledge and career information with you
- We use Client and Supplier personal data for the purposes of making and receiving payments in the ordinary course of business.

We reserve the right to transfer your information to a third party in the event of a sale, merger, liquidation, receivership or transfer of all or substantially all of the assets of our company provided that the third party agrees to adhere to the terms of this Privacy Policy and provided that the third party only uses your Personal Data for the purposes that you provided it to us. You will be notified in the event of any such transfer and you will be afforded an opportunity to optout.

What if I do not agree with this privacy policy?

If you do not agree with our processing of your data in the manner outlined below, please do not submit any personal data to us.

How long will you hold my information for?

If you have submitted your CV, Personal Information or your Company Details in any manner to Avarn LP, and are deemed to be eligible for representation to clients of Avarn, we will store your relevant information in our company database. We will hold your information for a period of two years from last documented interaction with you, or until such time as you request that we delete it. After a period of 2 years has expired, we will endeavor to update your information. However, while we will use reasonable endeavors to ensure that your Personal Data is maintained and up to date, you are under a duty to inform us of any and all changes to your Personal Data to ensure that it is up to date.

Who has access to my information?

We limit access to the internal systems that hold Personal Information to a select group of authorized employees, each of whom are given access through the use of a unique identifier and password. Access to Personal Information on these systems is limited to such employees for the sole purpose of performing their job duties.

How will I be contacted?

Avarn LP may also periodically request further information from you to better evaluate your eligibility, to better our services or to continue working with you. We will utilize personal data in the form of email addresses and contact telephone numbers in order to keep our clients and potential clients informed in relation to careers and market related information. We may contact you either by telephone, e-mail or any business and employment orientated social network that you submit.

In submitting your personal data to us, you expressly consent to receiving communications through these means and otherwise being contacted for these purposes.

# **Security of your Personal Information**

We are committed to ensuring that your information is secure. In order to prevent unauthorized access or disclosure, we have put in place suitable physical, electronic and administrative procedures to safeguard and secure the information we collect online.

While Avarn LP takes all due care in ensuring the privacy and integrity of the information that you provide, we recognize that no data transmission over the Internet can be guaranteed to be 100% secure. The possibility exists that this information could be unlawfully observed by a third party while in transit over the Internet or while stored on Avarn LP's systems. Avarn LP accepts no liability should this occur.

### **Cookies**

Our site uses Analytics Cookies.

In order to monitor how our sites are performing, we collect data about page visits. This information is completely anonymous — we cannot determine who it came from. When we use this data, we look at numbers of visitors overall rather than individual visits.

Analytics information is used in reports and to improve our site. For example, we have used analytics data to add, remove or change features of the site based on how popular they are with users.

Examples of what we track:

- the numbers of visitors to individual pages;
- when pages were visited;
- how long users stayed on the page;
- the page they came from;

• technical data about the device being used to browse the site (such as browser and operating system version, and display size) — we use this data to ensure that the technology our site uses is appropriate for the majority of our users, and how best to display the site for users who have less capable browsers.

We retain such tracking data before automatically deleting it after 38 months. When data reaches the end of this retention period, it is deleted automatically.

More information about analytics cookies

We use Google to provide our analytics data. You can read more about how Google Analytics treats your data at: Google: <u>Safeguarding your data</u>

You can also read Google's full privacy policy

# **Changes to this Privacy Policy**

Avarn LP reserves the right to modify the terms and conditions of this Privacy Policy at any time, and such modifications shall be effective immediately upon posting of the modified Privacy Policy on this website. Your continued use of the website following the posting of any modified terms shall be deemed your conclusive acceptance of the modified Privacy Policy with respect to information you provide from that time onward. If you do not agree with any modifications posted by Avarn LP, you may request deletion of any records we might hold, if any, and discontinue use of this website.

**AVARN LP** 

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