



ADOK SOLUTIONS

This privacy notice

Background and introduction

- This privacy notice relates to adok-solutions.com ("Website") and the services provided by Adok-solutions Group (as defined below) and applies to:
 - Candidates who use the services of Adok-solutions Group (whether or not they do so via the Website);
 - Visitors to and registered users of the Website. Registered users of the Website are referred to as "Registered Users";
 - Current and former employees, workers and contractors of Adok-solutions Group ("Adok-solutions Personnel"), who may or may not be Registered Users of the Website. This notice does not form part of any contract of employment or other contracts to provide services.
- References to "Adok-solutions Group" mean Adok-solutions company and each of its direct and indirect subsidiaries.
- Adok-solutions is a company registered in the Hague chamber of commerce, whose address is Wilhelmina van Pruysenweg 35, 2595 AN, The Hague, Netherlands.
- This privacy notice provides important information about how Adok-solutions Group and its group companies handle your data, particularly what personal data we collect and how we and our associated companies may use such personal data.
- References to 'we', 'our' or 'us' in this privacy notice are references to Adok-solutions Group and the relevant company within Adok-solutions Group.
- Any reference to 'you', 'your', or 'yourself' in this privacy notice is a reference to any visitor to the Website and/or any person who registers on the Website or uses services related to the Website and/or Adok-solutions Personnel.
- This privacy notice does not apply to you if you are a client of Adok-solutions Group (our engagement letter and terms of business state the nature and purposes of our processing). Any reference in this privacy notice to a Client is to a client of Adok-

solutions Group to whom we provide services to facilitate the appointment or recruitment of contractors or personnel.

- Any reference to 'Services' in this privacy notice refers to services provided by Adok-solutions Group to Candidates, Registered Users and other visitors to the Website.
- Any reference to "Candidate" in this privacy notice refers to any person who is a candidate or potential candidate for a job or position who uses the Services.

Data Controllers

- For Adok-solutions Personnel, the company within the Adok-solutions Group that you have a contractual relationship with will normally be a data controller of personal data which you provide to us, which means that it decides the purposes and means of the processing of that personal information. If you are a visitor or registered user, Adok-solutions will normally be a data controller of the personal data which you provide to us. However, as this privacy notice explains, your data may be shared within Adok-solutions Group for purposes outlined in the privacy notice, so data controllers of the personal data may be from other group companies within the Adok-solutions Group.

Personal data

- Personal data is any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

Contacting Us

- You can contact us via the details set out in paragraph 9 below.

Data Protection Principles

When processing your data, we will comply with applicable data protection laws and principles, including the Data Protection Act referred to as EU GDPR, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

1. PERSONAL INFORMATION

a) Visitors to our Website

- When someone visits our Website or related online platforms, we use third-party analytics tools to collect standard internet log information and details of visitor behaviour patterns.
- These tools use functions such as heatmaps, click history and replay sessions to understand website issues that could hamper the user experience.
- We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone and is explained further in paragraph 7 below (*Cookies*).

b) Registered Users and Adok-solutions Personnel

- When you use any of our Services (as a Registered User) and/or join Adok-solutions Group (as Adok-solutions Personnel), or you otherwise interact with us as a Candidate, you may provide us with your personal information (for example by uploading or inputting into the Website or any of Adok-solutions Group's online applications or platforms) or we may otherwise obtain personal information about you, such as the following information regarding your:

Registered Users, Adok-solutions Personnel and Candidates

- Contact information: for example, Name, Title, Telephone, Email, LinkedIn URL, Address.
- Identity information: date of birth, gender, national insurance number and other tax or governmental identifiers.
- Security credentials, online identifiers (including social media identifiers).
- Job preferences, salary requirements.
- Education and qualifications.
- Employment history.
- Associations, licences and certifications,
- Professional skills, languages.
- Interests and hobbies.
- Marital status and dependents.
- bank accounts, payroll and tax status.
- driving licence (including copies thereof where we are required to hold such information for identification);
- recruitment (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process);
- Your usage records and history of our Website, information and communications systems;
- image in photographic form.

Adok-solutions Personnel

- In addition to the above personal information, we may also collect the following personal information from Adok-solutions Personnel:
 - marital status and dependents;
 - national insurance number and other tax or governmental identifiers*;
 - bank accounts, payroll and tax status*;
- salary, annual leave, pension and benefits*;
- Next of kin and emergency contacts;
 - start date;
 - location of employment or workplace;
 - driving licence (including copies thereof where we are required to hold such information for identification or insurance purposes where you are to use our vehicles)*;
 - compensation history;
 - pension and pension entitlements*;
 - recruitment (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process);
 - employment records (including job titles, work history, working hours, training records and professional memberships)*;
 - performance including that generated through our appraisal systems;
 - disciplinary and grievance information*;
 - movements through CCTV footage and other information obtained through electronic means such as swipe card and key fob records;
 - use of our information and communications systems;
 - shareholding, option, SARS and dividend entitlement*.

c) Special Category and Sensitive Personal Data

- We may also collect, store and use the following "special categories" of more sensitive personal information regarding you:
 - information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
 - information about your health including any medical condition, health and sickness records; and
 - information about criminal convictions and offences.

2. USES MADE OF THE INFORMATION

- We will use the personal information we collect about you to:
 - Carry out the Services to Registered Users, Candidates and visitors.
 - Provide related services to our Clients.

- Assess (or help our Clients assess) your skills, qualifications, and suitability for positions that Clients may have available.
- Communicate with you in connection with the Services.
- Communicate with our Clients in connection with the Services.
- Keep records related your use of the Services.
- Comply with legal or regulatory requirements including health and safety obligations*;
- Prevent fraud.
- Provide related services to our Clients.
- Monitor your use of our information and communication systems to ensure compliance with our IT policies.
- Ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- In addition, we will process the personal information of Adok-solutions Personnel for the purposes listed below:
 - making a decision about your recruitment or appointment;
 - carry out background and reference checks, where applicable, and with permission from data subject
 - determining the terms on which you work for us;
 - checking you are legally entitled to work in your assignment location*;
 - paying you and, if you are an employee, deducting tax and National Insurance or Social Security contributions*;
 - providing benefits of employment, including flexible benefits*;
 - liaising with your pension provider;
 - administering the contract we have entered into with you;
 - business management and planning, including accounting and auditing;
 - conducting performance reviews, managing performance and determining performance requirements;
 - making decisions about salary reviews and compensation;
 - assessing qualifications for a particular job or task, including decisions about promotions;
 - gathering evidence for possible grievance or disciplinary hearings;
 - making decisions about your continued employment or engagement;
 - making arrangements for the termination of our working relationship;
 - education, training and development requirements;
 - dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work;
 - ascertaining your fitness to work;
 - managing sickness absence;
 - complying with health and safety obligations*;
 - to monitor your use of our information and communication systems to ensure compliance with our IT policies;

- to ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution; and
- to conduct data analytics studies to review and better understand employee retention and attrition rates;
- equal opportunities monitoring;
- to manage and report on shareholding, options and dividend details.

(The use of an asterisk in the above lists is used to indicate performance of legal obligation as lawful ground of use as explained further below).

Legal Grounds for Processing

- We are committed to protecting your privacy and will only use your personal information in accordance with applicable data protection legislation, including the Data Protection Act EU GDPR, we will use your personal information in the following circumstances:
 - where we need to perform the contract we have entered into with you;
 - where we need to comply with a legal obligation; and
 - where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
 - We may also use your personal information in the following situations, which are likely to be rare:
 - where we need to protect your interests (or someone else's interests); and
 - where it is needed in the public interest.
- We need most of the categories of information listed above primarily to allow us to perform our contract with you (or to take steps required by you) and, where indicated above by an asterisk (*), to enable us to comply with legal obligations.
- In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests, for example:
- using your contact details and curriculum vitae to provide our related services to our Clients
- using your information to prevent fraud and maintain security of our systems and data, such as monitoring movements through CCTV footage and other information obtained through electronic means such as swipecard and key fob records
- to monitor your use of our Website and systems to check compliance with our policies
- to use your service and employee records to conduct data analytics studies to review and better understand employee retention and attrition rates
- There are more limited circumstances where we process personal data pursuant to your consent, for example, where we use your consent as the basis to direct market to you. You will always be given the opportunity to withdraw your consent obtained for direct marketing by contacting us at the address set out in paragraph 9.

- Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information. As indicated above, the above processing will be primarily to allow us to perform our contract with you and, where indicated above by an asterisk (*), to enable us to comply with legal obligations.
- The above processing that is not carried out to perform our contract with you or comply with legal obligations is justified to pursue the legitimate interests of our own. In addition to those legitimate interests identified above, our legitimate interests include appointing employees, workers and contractors and to manage those relationships to pursue our commercial interests in a legally compliant, industry standard and prudent way, to keep systems and information secure and to manage our workforce.
- If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying Adok-solutions Personnel or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of Adok-solutions Personnel).
- We will only use your personal information for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you, and we will explain the legal basis which allows us to do so.
- Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Special categories and sensitive data

- "Special categories" of particularly sensitive personal information (summarised in paragraph 1 (c) above) require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information for Adok-solutions Personnel. We only process special categories of personal information for Adok-solutions Personnel.
- We may process special categories of personal information in the following circumstances:
 - in limited circumstances, with your explicit written consent;
 - where we need to carry out our legal obligations or perform a contract with you;
 - where it is needed in the public interest, such as for equal opportunities monitoring or for Adok-solutions Personnel in relation to our occupational pension scheme; and
 - where it is needed to assess Adok-solutions Personnel working capacity on health grounds, subject to appropriate confidentiality safeguards.
 - Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.
- We will use your personal information in the following special categories in the following ways:

- we will use information relating to your absence from work, which may include sickness absence or family-related absences, to comply with employment and other laws;
- we will use information about criminal convictions to comply with the law and to determine your eligibility to undertake particular types of work;
- we will use information about your physical or mental health or disability status to ensure your health and safety in the workplace and to assess your fitness to work, provide appropriate workplace adjustments, monitor and manage sickness absence and administer benefits;
- we will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation to ensure meaningful equal opportunity monitoring and reporting; and
- We will use trade union membership information to pay trade union premiums, register the status of a protected employee and comply with employment law obligations.
- We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.
- Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in paragraph 9. Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent.
- You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making unless we have a lawful basis for doing so and we have notified you.

3. DISCLOSURE OF YOUR PERSONAL INFORMATION

- We may share your personal information where it is necessary to administer the working relationship or we have a legitimate interest in so doing. We may also disclose your personal information to third parties if we are under a duty to disclose or share your personal information to comply with any legal obligation, or to enforce or apply such other terms as apply to our relationship, or to protect rights, property, or safety of our other employees, workers and contractors our customers, ourselves or others. with you or where we have a legitimate interest in doing so. This includes exchanging information with other companies and organisations to provide references and fraud protection.

- "Third parties" includes third-party service providers (including contractors and designated agents) and other entities and group companies within the Adok-solutions Group.
- The third parties we share your personal information with where required by law are courts and governmental agencies.
- The third parties we share your personal information with where it is necessary to administer the working relationship with you include (where you are a contractor) the client of ours for whom you are ultimately providing services to.
- The following activities are carried out by third-party service providers: payroll, pension administration, benefits provision and administration and IT services. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your data for their purposes. We only permit them to process your data for specified purposes and in accordance with our instructions.
- We will share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data. All members of the Adok-solutions Group are bound by this privacy policy.
- We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.
- In certain cases, the disclosure of your personal information to a third party as described in this paragraph 3 may involve your personal information being transferred outside of the Europe. This may be to:
 - a country outside of the European Economic Area which is not considered to have the same standards of protection for personal data as those in the EU Zone, in which case we will take all steps required by law to ensure sufficient protections are in place to safeguard your personal information, including where appropriate putting in place contractual terms approved by the relevant regulatory authorities.
- For more information about the circumstances in which your personal information may be disclosed to third parties and the safeguards we put in place to protect your personal information when we do so, please contact us as described in paragraph 9.

4. DATA SECURITY

- We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to

know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

- We have established procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.
- You should take all reasonable steps to keep your personal information held on our IT systems secure, including choosing a secure password for your accounts and not disclosing your passwords to anybody else. You should use a unique password for every account. Further details are in our IT and password policies.

5. RETENTION, UPDATING AND REMOVAL OF YOUR PERSONAL INFORMATION

- The duration we keep your personal information will depend on the type of information and the reason we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained for at least six years in accordance with usual commercial practice and regulatory requirements.
- It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example, if you move home or change your phone number or email address. You may be able to update some of the personal information we hold about you through our customer portal. Alternatively, you can contact us using the details in paragraph 9.
- Under certain circumstances, by law, you have the right to:
 - request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it;
 - request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
 - request the erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us to continue to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest, and there is something about your particular situation which makes you want to object to processing on this ground;
 - request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example, if you want us to establish its accuracy or the reason for processing it;
 - object to the processing of your personal information where we are relying on a legitimate interest (or those of a third party), and there is something about your particular situation which makes you want to object to processing on this ground.

- You also have the right to object where we are processing your personal information for direct marketing purposes, and
 - request the transfer of your personal information to another party.
- If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please use the contact details in paragraph 9.
- You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

6. ENQUIRIES, ISSUES AND COMPLAINTS

- If you have any concerns about how we use your personal information, please contact us as described in paragraph 9.
- If you make a complaint about our handling of your personal information, it will be dealt with in accordance with our complaints handling procedure accessible on our Website – adok-solutions.com/contact

7. COOKIES

- This Website uses cookies. Cookies are text files placed on your computer, that are stored on your browser or the hard drive of your computer or other device when you visit this Website. This allows the Website to recognise you as a user either for the duration of your visit (using a 'session cookie') or for repeat visits (a 'persistent cookie'). They are not harmful and do not contain any information such as your home address, date of birth or credit card details. Cookies are an essential part of how the Website works, as they remember certain information about a visitor. We use First Party cookies (these are placed there and used solely by Adok-solutions Group).
- The cookies we use fall into the following broad types:
 - **Strictly Necessary Cookies:** These cookies are essential in helping you to move around the Website and use its features, such as accessing secure areas of the Website. Without these cookies, services you have asked for, such as setting up an account cannot be provided.
 - **Analytical/Performance Cookies:** To keep the Website and Services relevant and up-to-date and to improve user experience, we use web analytics services and

cookies to help us understand how people use the Website. For example, we can see which parts of the Website and products are most popular, identify when errors occur, and test different versions of a page or feature to see which one works best.

- **Functionality Cookies:** These cookies allow websites and applications to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. The information these cookies collect is usually anonymised which means we can't identify you personally. They do not gather any information about you that could be used for selling advertising or remembering where you've been on the internet but help us provide more relevant services.
- **Targeted Marketing Cookies:** We also use cookies to assist in targeted advertising. We also use them to measure the effectiveness of our marketing communications, for example by telling us if you have responded to an advert we sent you. Without these cookies, online advertisements you encounter will be less relevant to you and your interests.
- You can choose to enable or disable Cookies in your internet browser by consulting the "Help" tab of your browser via the menu bar. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third-party cookies. By default, most internet browsers accept cookies, but this can be changed. However, please keep in mind that if you disable cookies, you may not be able to use the full functionality of the Website. For further details, please consult the help menu in your internet browser. You can find more information about cookies at <http://www.allaboutcookies.org/> and youronlinechoices.com/.
- You can choose to delete Cookies at any time however you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.
- It is recommended that you make sure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings. By using our Website, you will be deemed to have accepted this Cookie Policy.

8. CHANGES TO THIS PRIVACY NOTICE

- We reserve the right to alter this privacy notice at any time. Such alterations will be posted on our Website. You can also obtain an up-to-date copy of our privacy notice by contacting us as described in paragraph 9. Should you object to any alteration, please contact us.

9. CONTACTING US

- If you need to contact us about this notice or any matters relating to the personal information we hold on you, you can write to the Data Protection Officer, email: info@adok-solutions.com.

10. FURTHER INFORMATION

- We hope that this privacy notice addresses any queries you may have about the personal information we may hold about you and what we may do with it. However, if you do have any further queries, comments or requests, please contact us as described in paragraph 9
- Whilst this privacy notice sets out a general summary of your legal rights concerning personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's Website at <https://gdpr-info.eu/>