

PRIVACY NOTICE

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1 General

Tech Skills Resources Limited ('Tech Skills') is committed to protecting all personal categories of data held on you.

As such, Tech Skills wants you, the 'data subject', to understand how Tech Skills collects, uses, stores, and shares your personal data. Tech Skills also wants you understand what rights you can invoke to help you to protect your privacy. In this regard, it is important that you read this Privacy Notice and understand how Tech Skills uses your personal data. Please note Tech Skills reserves the right to update this Privacy Notice as required. The most recent version of this document can be found on Tech Skills' website through the following link: <https://techskills.ie/privacy-policy/>

1.1 Tech Skills Resources Information

Tech Skills a leading recruitment company specializing in providing HR and staffing solutions to industry and commerce throughout Ireland. Tech Skills was founded over 20 years ago by experienced recruiters for sourcing and placing technical candidates with clients in the construction, engineering and related sectors. Tech Skills Resources is part of the Cpl Group. If you wish to locate further information on Tech Skills, you can find this on the Tech Skills website through the following link: <https://techskills.ie/about-us/>

1.2 Legislation

All personal data processed by Tech Skills is done so in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

1.3 Queries and Complaints

If you are unhappy with the way Tech Skills handles your personal data and wish to complain, or if you simply want further information about the way your personal data will be used, please contact Tech Skills at the below:

Data Protection Officer

Tech Skills Resources

25 Merrion Square North

Saint Peter's

Dublin, D02 E392

Ireland

Telephone: +353 1 6390390

Email: dataprivacy@cpl.com

You have the right to lodge a complaint with the Data Protection Commission. To contact the Data Protection Commission, please use the following details:

Data Protection Commission

21 Fitzwilliam Square South

Dublin 2

D02 RD28

Ireland

Telephone: +353 (0)761 104 800

Telephone: +353 (0)57 868 4800

Email: info@dataprotection.ie

1.4 Breaches

Tech Skills will take all appropriate technical and organisational steps to safeguard your personal data. In the unlikely event of a data breach, Tech Skills will contact you in line with Tech Skills' legal obligations.

2 How Does Tech Skills Resources Collect Information?

Tech Skills collects personal data to enable the provision of services to support Tech Skills' purpose. The following non-exhaustive methods of data collection are an indication of ways in which Tech Skills may obtain your information:

- Obtain personal data directly from you; and
- Personal data that Tech Skills receives from other sources;

It is important that the personal data you provide Tech Skills is up to date and accurate. As outlined in Section 7.4 of this notice, if personal data Tech Skills holds on you is inaccurate or incomplete, please contact Tech Skills and Tech Skills will update the information.

3 What Does Tech Skills Resources Use Information For?

3.1 Process, Purpose, and Lawful Basis

Tech Skills uses personal data collected to fulfil Tech Skills’ obligations to provide Recruitment & Consultancy services and to enable the provision of services to support Tech Skills’ purpose.

Tech Skills uses personal data for any of the following purposes:

Process	Purpose	Lawful Basis
Pre-Recruitment	To register a prospective data subject’s interest in recruitment for employment.	Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract. The processing is necessary for the exercise of rights and obligations under employment law.
Background Checks	To verify if the data subject is qualified and eligible for certain positions within Tech Skills.	Processing is necessary for compliance with a legal obligation to which Tech Skills is subject.
Recruitment and Selection	To complete the recruitment process and assess data subject suitability.	Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract. Processing relates to Tech Skills’ obligations in employment and for assessing data subject’s work capacity.
Payroll	To enable Tech Skills to effect payment to its data subjects.	Processing is necessary for the performance of a contract to which the data subject is party.
Personnel File	To comply with employment and revenue laws and to ensure that terms and	Processing is necessary for the performance of a

	conditions of employment are adhered to.	<p>contract to which the data subject is party.</p> <p>To comply with various employment and revenue laws.</p> <p>To protect the vital interests of the data subject in the event of an accident or emergency.</p>
Entitlement to Work	To enable Tech Skills to achieve compliance with its obligations pursuant to any local legislation governing the entitlement to work.	Processing is necessary for compliance with a legal obligation to which Tech Skills is subject.
Time and Attendance Records	To enable the data subject to avail of their rights and entitlement pursuant to the Organisation of Working Time Act 1997.	The processing is necessary for the performance of contract to which the data subject is party.
Statutory Entitlement	To enable Tech Skills to achieve compliance with: <ul style="list-style-type: none"> • Its obligation to the data subject; • Record keeping obligations pursuant to a variety of employment law statutes. 	The processing is necessary for compliance with legal obligation to which Tech Skills is subject.
Performance Details	To manage the data subject's performance in accordance with relevant Tech Skills policies.	The processing is necessary for the performance of contract to which the data subject is party.
Grievance and Disciplinary	To ensure the data subject's complaints are fairly investigated in accordance with Tech Skills policies.	<p>To comply with Tech Skills legal obligation to apply fair procedures to any data subject's investigation.</p> <p>The processing is necessary for the performance of contract to which the data subject is party.</p>

Medical Information	<p>To manage the data subject's absences, to manage sick pay in accordance with the contract of employment, and to manage the fitness to work of data subjects.</p>	<p>Processing is necessary to assess, subject to data subject safeguards, the working capacity of the data subject.</p> <p>To carry out obligations and exercise rights under employment law.</p>
Making or Receiving Payments	<p>To make or receive any payments in the discharge of normal business functions, dispute settlement, or to carry out any other payment requirements.</p>	<p>Processing is necessary for compliance with various employment and revenue laws.</p> <p>The processing is necessary for the performance of contract to which the data subject is party.</p>
Voice of the Customer	<p>To obtain the data subject's feedback by survey on the Tech Skills client services, recruitment processes and for research purposes.</p>	<p>Processing is based on request of consent which will be taken from the data subject.</p>
Attracting Talent	<p>To provide support and assistance on recruitment services to data subjects via third party sources, such as LinkedIn and other job sites, from which Tech Skills obtain personal data.</p>	<p>Processing is based on legitimate interest.</p>
Supporting Talent	<p>To support data subjects in their career guidance and communicate with them directly with useful information, advice, and support materials through email, messaging, or mobile/web notification.</p>	<p>Processing is based on legitimate interests and contractual obligations.</p>
Regulatory Compliance	<p>To comply with financial regulations and any other relevant laws and regulations.</p>	<p>Processing is necessary for compliance with a legal obligation to which Tech Skills is subject.</p>

		Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
Third Party Data Sharing	To allow Tech Skills to conduct and carry out functions with third party service providers that enable Tech Skills to deliver services.	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
Back-ups	To store personal data and make back-ups of that data in case of emergencies and for disaster recovery purposes.	Processing is necessary for compliance with a legal obligation to which Tech Skills is subject.
Evidence Submissions	To gather information for dispute resolution services and legal proceedings.	Processing is necessary for compliance with a legal obligation to which Tech Skills is subject.
Transfer of Information for Parties Legal Proceedings	To allow parties to commence legal proceedings.	Processing is necessary for compliance with a legal obligation to which Tech Skills is subject.
Accidents and Incidents	To enable Tech Skills to comply with data subject record keeping obligation pursuant to the Safety, Health, and Welfare Act 2005.	Processing is necessary for compliance with a legal obligation to which Tech Skills is subject.

4 Who Does Tech Skills Resources Share Information With?

Tech Skills may share personal data with other parties in the course of Tech Skills' duties. When this is done, Tech Skills adheres to the following principles:

- The transfer is based on a legal obligation, the performance of a contract, or explicit consent.
- Where data is transferred to another party, Tech Skills ensures appropriate technical and organisational safeguards are used to protect your personal data.
- Where Tech Skills engages a third party to provide a service to Tech Skills, Tech Skills ensures the provider has taken appropriate technical and organisational measures to process, store, and safeguard your personal data.
- Tech Skills, as a Data Controller, will not sell your data to any third party and will take all appropriate steps to ensure the security of your data in dealings with third parties.

While the parties Tech Skills engage may change occasionally, Tech Skills believe it is important you are aware of the types of parties Tech Skills shares data with. The categories and types of third parties outlined below is a non-exhaustive list but provides an indication of the parties Tech Skills shares data with.

4.1 Other Third Parties

Third parties for the purposes of internal and external audits, carrying out research, general practitioners, and or third parties who may improve Tech Skills' processes and services (such as consultants).

4.2 Government Departments, Bodies or Agencies

Tech Skills is legally obligated to share personal data with state actors which is outlined in the Data Protection Act 2018.

Recipients of this data include Government departments, agencies, bodies, investigatory bodies, local authorities, and the Gardaí.

4.3 International Transfers

Where personal data is transferred outside the European Economic Area, Tech Skills use safeguards known as Standard Contractual Clauses (SCCs).

5 What Type of Information is Collected?

To fulfil Tech Skills' mandate and perform tasks as outlined in this statement, Tech Skills needs to collect various types of personal data.

While the type of personal data may change occasionally, Tech Skills believes it is important you are aware of the types of data Tech Skills gathers and uses. The following table is a non-

exhaustive list and provides an indication of the categories and types of data Tech Skills uses to perform Tech Skills’ tasks.

Please note that information listed under one category may be used for the performance of a task or in relation to activities under another heading or as outlined under Section 3.

Category	Type of Data
Candidates	<ul style="list-style-type: none"> • First name, last name, email address, home address, phone numbers, qualifications, employment history, resume and cover letter, interview notes, interview feedback
Employees	<ul style="list-style-type: none"> • First name, last name, personal details, email addresses and phone numbers, photos, qualifications and certificates, past employment details, resume, annual leave details, performance documents and progress reports, • Special data such as fitness to work certificate, proof of right to work in Ireland, work VISA, GNIB card and sick leave details. • Criminal data such as Garda Vetting disclosures.
Other Stakeholders	<ul style="list-style-type: none"> • Contact details, first name last name, email address, bank details and payment details.

6 How Long Does Tech Skills Resources Retain Information?

Tech Skills has developed a record retention schedule for all the personal data Tech Skills holds. Each retention period varies dependent on the nature and the purpose of the processing.

The main factors which determine retention periods are as follows:

1. How long it is required to perform the task;
2. Any legal requirements to hold onto the data;
3. Any pending legal actions.

If you would like to see a copy of the Retention Policy, please contact the DPO at dataprivacy@cpl.com

7 What Are Your Rights?

As a data subject, you will have the following rights as outlined in this section 7. **However, restrictions may apply in certain situations.**

7.1 Where do I send requests?

Please send all your requests to the contact details provided in Section 1, with as much detail as possible about your requirements to allow Tech Skills to deal with your request efficiently. To answer your request, Tech Skills may ask you to provide identification for verification purposes.

7.2 How long will a request take?

Upon receipt of a request, Tech Skills will have 30 days to provide an answer with an extension of two further months if required. If Tech Skills requires more time to deal with your request, Tech Skills will notify you of the delay and the reasons behind it within 30 days of the receipt of the request. If Tech Skills refuses your request, Tech Skills will also notify you within 30 days of the receipt of the request accompanied by the reasons for the refusal.

Tech Skills will not charge a fee for any requests, provided Tech Skills does not consider them to be unjustified or excessive. If Tech Skills considers these to be unjustified or excessive, Tech Skills may charge a reasonable fee (also applicable for multiple copies) or refuse the request.

You are entitled to contact the Data Protection Commission if Tech Skills refuses your request.

7.3 Right of Access

You have a right to know what personal data Tech Skills hold on you, why Tech Skills holds the data, and how Tech Skills is processing your personal data.

When submitting your request, please provide Tech Skills with information to help verify your identity and as much detail as possible to help Tech Skills understand the information you wish to access (i.e. date range, subject of the request) and email dataprivacy@cpl.com

Please note that an access request is free of charge, however, where Tech Skills determines a request to be unjustified or excessive, Tech Skills may charge you a reasonable fee.

7.4 Right to Rectification

You have a right to request that Tech Skills information held on you is up to date and accurate.

Where information is inaccurate or incomplete, Tech Skills encourage you to contact Tech Skills to have this information rectified. Upon receipt of request, Tech Skills will ensure that the personal data is rectified and as up to date as is reasonably possible.

7.5 Right to be Forgotten

You have the right to seek the erasure of your personal data in the following circumstances:

- The personal data is no longer required for the purposes for which it was obtained;

- Where data is being processed on the basis of consent, you withdraw consent to the processing and no other lawful basis exists;
- The personal data is being unlawfully processed;
- You object to the processing of personal data and there are no overriding legitimate grounds for the processing;
- Your personal data requires deletion in line with legal requirements.

However, Tech Skills will be unable to fulfil an erasure request if the processing of personal data is necessary for the following:

- Exercising the right of freedom of expression and information;
- Compliance with a legal obligation or for the performance of a task carried out in public interest;
- Reasons of public interest in the area of public health;
- Archiving or statistical purposes in the public interest;
- The establishment, exercise, or defence of legal claims;

Please note that where the legal basis for Tech Skills' processing of personal data is on the basis of a legal obligation, some processing in relation to your data may not be subject to the right to erasure.

To determine your request for erasure, Tech Skills will carry out an assessment of the justification for the retaining your personal data where a legal requirement applies and contact you if Tech Skills is unable to fulfil your request.

Please be aware that in some circumstances Tech Skills may need to retain some information to ensure all your preferences are properly respected. For example, Tech Skills cannot erase all information about you where you have also asked Tech Skills not to send you marketing material. Otherwise, Tech Skills would delete your preference not to receive marketing material.

7.6 Right to Restriction

You have the right to restrict the extent of personal data processed by Tech Skills in circumstances where:

- You believe the personal data is not accurate (restriction period will exist until Tech Skills updates your information);
- The processing of the personal data is unlawful, but you wish to restrict the processing of data rather than erase it;

- Where the personal data is no longer required by Tech Skills, but you require retention of the information for the establishment, exercise, or defence of a legal claim;
- You have a pending objection to the processing of the personal data;

When processing is restricted, your personal data will only be processed: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of other people; or for reasons important to public interest.

Tech Skills will contact you to confirm where the request for restriction is fulfilled and will only lift the restriction after Tech Skills has informed you that Tech Skills is doing so.

7.7 Right to Data Portability

You have the right to the provision of all personal data held in relation to you in a structured, commonly used and machine-readable format where:

- Processing is completed on the basis of a contract;
- Processing is completed based on consent by you;
- Processing is carried out by automated means.

You may also request that Tech Skills sends this personal data to another data controller where technically feasible.

7.8 Right to Object

You have the right to object to the processing of your personal data; however, the processing must have been undertaken on the basis of public interest or legitimate interest by Tech Skills.

If you wish to object to the processing of data, please contact Tech Skills with your request. Tech Skills will then stop the processing of personal data unless it is required for legal proceedings.