

# Privacy Policy

## The GDPR Principles & Objectives

We are committed to ensuring that all personal data obtained and processed by Frontwise Group d.o.o.e.l. is done so in accordance with the GDPR and its principles, along with any associated regulations and/or codes of conduct laid out by the Supervisory Authority and local law. We are dedicated to ensuring the safe, secure, ethical and transparent use of all personal data and to upholding the highest standards of data processing.

Frontwise Group uses the below objectives to meet the regulatory requirements of the GDPR and to develop measures, procedures and controls for maintaining and ensuring compliance.

Frontwise Group ensures that:

1. We protect the rights of individuals with regards to the personal information known and held about them by Frontwise Group in the course of our business.
2. We develop, implement and maintain a data protection policy, procedure, audit plan and training program for compliance with the GDPR.
3. Every business practice, task and process carried out by Frontwise Group, is monitored for compliance with the GDPR and its principles.
4. All employees are competent and knowledgeable about their GDPR obligations and are provided with training in the GDPR principles, regulations and how they apply to our business and services.
5. Any information provided to an individual in relation to personal data held or used about them, with be provided in a concise, transparent, intelligible and easily accessible form, using clear and plain language.

### When do we collect your personal data?

Frontwise Group is collecting your data when:

- We find your LinkedIn, Monsterboard or Facebook profile suitable for any of our open vacancies for any of our current clients.
- When you approach us via LinkedIn (or any other social/professional network), our website, or e-mails willing to be considered for current or future opportunities.
- When you apply to our vacancy advertisements

We securely store your data in our CRM system and we make sure that you have access to it to keep the data up to date or remove it on your request. If you want your data removed from the system we will remove this within the shortest amount of time. When data is stored under the circumstances described in point 1. we immediately ask for your consent in order to keep it in our CRM system more than 30 days.

### Who is collecting your personal data?

Your personal data is collected by Recruitment Consultants/Talent acquisition consultants employed at Frontwise Group that are responsible for the specific job opportunity/service/client. After we get your explicit consent, your personal data is available to all Recruitment Consultants/Talent acquisition consultants employed in Frontwise Group in order to be able to contact you for job opportunities that are relevant to you.

### How your personal data is collected?

Your personal data is collected from your public profiles on various professional/social network platforms (such as LinkedIn, Monsterboard, Facebook, Twitter). The data is entered manually in our secure CRM system

### Why do we collect your personal data?

We require this information to understand your career needs and goals, and provide you with the best possible career opportunities, and in particular for the following reasons:

- To be able to contact you
- To provide you with a job opportunity best suited to your skills and ambitions
- To make lists with potential candidates for a specific vacancy Internal record keeping
- Everything that is stated in "How we use information on candidates and for what purposes"

### What personal information do we collect from you?

We process the personal data necessary for our service; part of this information is required to use our services. Additional information may be desirable in order to better tailor the service to your wishes and qualities or to meet more specific questions or obligations from clients. You are responsible for the accuracy and relevance of the information you provided on your social/professional network profile or directly to us.

When searching/sourcing for candidates for specific vacancy we store only essential data necessary for our services. More specifically, these concerns – among other things and as far as applicable – the following (documents with) personal data:

- your name and current job title
- your contact information limited to email address, phone number (when applicable), and a link to your public professional/social platform profile.

Frontwise Group does not record special personal data. 'Special personal data' refers to data on race, religion or belief, political opinion, health, sexual life, trade union membership, criminal data and / or personal data about unlawful or obstructive behavior.

### Privacy and the use of CV's

During the application for jobs you can send our consultants your CV.

Your CV can be accessed by all Frontwise Group consultants in order to match your application to vacancies open with third parties (clients of Frontwise Group).

We may share your information with prospective employers in order to improve your opportunity of being recruited for jobs for which you have applied through Frontwise Group or vacancies in which you may be interested. Frontwise Group employees will not share your CV or any information you have provided us with any reason other than to achieve the purpose of finding employment for you.

### With whom can we share your personal data?

Frontwise Group may pass on your personal data to its clients or government authorities when required (as per GDPR). And in all other cases where we can be obliged to do so, for example by a court order.

The provision of the personal data takes place on the basis of a legitimate interest, legal obligation and / or to execute the agreement in accordance with the goals stated in "Why do we collect your personal data?" section.

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

The retention periods we use depend on the applicable statutory retention periods.

Your personal information (stated in "What personal information do we collect from you?" section) are available for:

- 30 days until we get your explicit consent
- 1 year if we do have your explicit consent. After 1 year we are obligated to ask for your explicit consent again.

#### **How we use information on candidates and for what purposes?**

We use information about our candidates in the following ways:

- To match the professional profile of a candidate to any positions we have been asked to fulfill by any of our clients, and including any related administrative use such as invoicing;
- To communicate with candidates about our services. For example, we may inform a candidate about a position that they may be interested in and/or to invite them to submit further information about themselves and/or to ask their consent to store their profile in our database and to forward it to a client.
- To comply with our legal obligations. In some instances, we may be under a legal obligation to store certain information about our candidates. For example, if we ask your consent to use certain information about you, we will store a record of your consent to comply with our requirements under data protection law.

#### **How to access your personal data?**

If Frontwise Group receive a request for access to personal information we will verify your identity before releasing your personal data to you. We will not release information to any third party.

If you would like to make a request for access to your personal information, please contact our Data Protection Officer: [magdalena.karadimcheva@Frontwise Group.com](mailto:magdalena.karadimcheva@Frontwise Group.com)

#### **Complaint**

If you have a complaint about the way your data is stored or handled by Frontwise Group you may contact our Data Protection Officer Magdalena Karadimcheva at [dataprotection@Frontwise Group.com](mailto:dataprotection@Frontwise Group.com).

#### **Notification of Breaches**

Frontwise Group is aware of our responsibility as a recruiter to protect your information and to only share details with third parties upon receipt of your explicit consent. All of our systems are protected and only Frontwise Group staff and consultants working for Frontwise Group have access to the personal information stored in your personal file in our CRM system.

In the unlikely event that our computer systems are compromised and there is a potential loss of confidentiality we will report this breach to you.

In the unlikely event that personal data is taken or exposed from Frontwise Group records without our consent, we will provide reports surrounding that exposure within 72 hours of being notified of such an event and take any action necessary to restore security of your personal data.

#### **Your Rights**

Any candidate whose data is included in our database may at any time exercise the following rights:

- To review the information that we hold about them in our database;
- To request correction of this information if it is factually wrong;
- To request deletion of the information if they no longer wish to be included in our database nor to be informed by us about career opportunities which match their professional qualifications;
- To change any privacy setting they have previously chosen

#### **Our Promise to our candidates**

Frontwise Group is committed to protecting the privacy of our candidates. We will do our best to ensure that your information remain private and is used only for purposes set forth. This privacy policy reflects our commitment to you.

#### **Changes to our Privacy Policy**

This privacy policy may be changed by Frontwise Group at any time. Any changes to our Privacy Policy will be updated on our website. If you have any questions or concerns, please email our GDPR Data Protection Officer at [dataprotection@Frontwise Group.com](mailto:dataprotection@Frontwise Group.com)