

**KOM**

14.10.2024

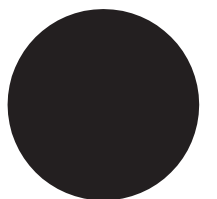
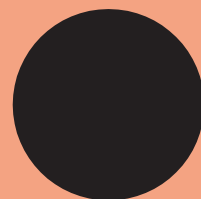
**BBA**



..

..

# **PRIVACY POLICY**



## Contents

KOMBA Privacy Policy.....	3
1. Purpose and Scope .....	3
2. What We Do .....	3
3. How does this Policy apply to me? .....	4
4. What personal data do we collect? .....	4
Sensitive or special category personal data .....	6
Children’s data.....	6
5. How we collect personal data .....	6
a) Information you provide us directly.....	6
b) Information that we automatically collect about you .....	7
c) Information that we obtain from third party sources .....	7
d) Publicly available sources.....	7
6. How we use personal data .....	8
a) For candidates .....	8
b) For business contacts (personnel of our prospective clients, clients, prospective suppliers and suppliers) 9	
c) Website users .....	9
d) Referees.....	10
7. Who your personal data is shared with.....	10
8. Legal basis for processing personal data .....	11
9. Data retention .....	12
10. Your rights .....	13
11. Your choices about marketing and advertising .....	15
12. Cookies and other technology.....	15
13. Data security.....	15
14. Personal data storage and transfer .....	16
15. Privacy policies of third parties .....	17
16. Changes to this Policy .....	17
17. How to contact us.....	17

# KOMBA Privacy Policy

*Last Updated: October 14, 2024,*

## 1. Purpose and Scope

KOMBA companies' network includes independent companies with separate legal entities that provide various sections of this website and other websites in the KOMBA member network; and this Personal Data Protection and Processing Policy applies separately for each KOMBA member company.

The website you visited is affiliated with KOMBA Talent (or the "**Company**"), one of the KOMBA member companies.

The main objective of this Personal Data Protection Policy (the "**Policy**") is to provide explanations regarding the personal data processing activities carried out by the Company pursuant to the law and the systems adopted for the protection of personal data and, in this context, to provide transparency by informing the people whose personal data is being processed by our company.

This Policy applies to all activities managed by the Company regarding the processing and protection of personal data by the Company along with the relevant detailed data procedures.

The protection of your personal data is important to us.

This Policy explains how we collect, use, disclose and protect your personal data and your choices about the collection and use of your personal data. It is important that you read this Policy in conjunction with any notices or statements that we may issue at the time of collecting your personal data where applicable. Such additional notices or statements supplement this Policy unless stated otherwise in such additional notice or statement.

References in this policy to "**we**", "**us**" or "**our**" are references to KOMBA Talent.

## 2. What We Do

KOMBA Talent provides:

- recruitment consultancy services placing candidates on a permanent, contract and interim basis across a range of industries and geographies ("**Recruitment Services**");
- Local and/or international offshore business process outsourcing services assisting companies with their permanent recruitment, contingent workforce solutions, supply chain and labour supply, commonly known as 'RPO', 'MSP' or 'Service Procurement Desk Services' ("**Outsourcing Services**"); and
- other consultancy services related to recruitment, human resources management and corporate governance ("**Advisory Services**").

### 3. How does this Policy apply to me?

We operate through a global network of affiliated entities and utilise vendors where needed to ensure we provide the best solutions to our clients. This Policy applies to the processing of personal data by KOMBA Talent as a controller. This means we determine the purposes and means of the processing of your personal data for our business purposes.

Due to the nature of our business, KOMBA Talent can also act as a processor on behalf of our clients. This means that when we are instructed by a client, we facilitate the processing of your personal data on behalf of that client. In this circumstance, the protections that apply to such personal data will be described in the individual privacy policies of those clients, and not in this Policy. We encourage you to reach out to them directly and read their privacy policies if you want to learn more about the privacy and data practices of those clients.

In further detail, and unless we notify you otherwise:

- We operate as a controller when processing your personal data for our Recruitment Services and Advisory Services. If we share your personal data with our clients as part of our Recruitment Services or Advisory Services, it is likely that our clients will also process your personal data as a controller. Our clients may request additional personal data from you as part of their hiring processes.
- We are the processor and our clients are the controllers of your personal data processed by us for our Outsourcing Services. Where we act as a processor, the privacy policy of our client will apply.
- If KOMBA Talent engages you on a temporary assignment, KOMBA Talent will be the controller of your personal data.

If you are uncertain about who is the controller of your personal data, please contact us using the [contact form](#) on our web site.

### 4. What personal data do we collect?

Data protection laws around the world define 'personal data' in different ways, but in general, we mean any information relating to an identified or identifiable person.

The personal data the Company collects will depend on the circumstances in which it is being collected and determined by your interaction with us, our clients and other sources.

We will only collect personal data that we are lawfully permitted to collect. Personal data we may collect includes, but is not limited to:

Type of Personal Data	Description of Personal Data
Identity data	Your title, first name, last name, maiden name, date of birth, gender, photograph, national insurance number (or equivalent in your country), nationality and other information relating to residency and citizenship which may be required to establish a right to work in a given country, marital status and number of dependents.
Contact data	Your physical and email address and telephone numbers, emergency contact details.
Historical data	Your educational history and credentials, employment history, criminal background history, social media, skills and qualifications, and results from any other background and disclosure checks in countries where it is lawful to carry out such checks.
Employment-related data	Your current remuneration, pension and benefits, what role you are looking for, what work-related areas interest you, third party references (if taken) and interview and assessment feedback created either by us or our client following an interview or assessment.
Verification data	A copy of your driving licence, passport, identity card or another form of identification and referee details.
Financial data	Your bank sort code and account number, tax-related information and credit checks.
Diversity data	We may collect diversity data for governmental reporting purposes, which may include racial or ethnic origin, religious or other similar beliefs and physical or mental health, including disability-related information.
Technical data	Your internet protocol (IP) address, MAC address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and location data.
Profile data	Your usernames applicable to accessing our services, interests in so far as these are applicable to the services we provide to you and other preferences and other insights or determinants that we have gained from our analysis and profiling of you.
Usage data	How you use, interact and navigate around our websites and what you browse within them.
Marketing data	Your preferences in receiving marketing from our third parties and us and your communication preferences.
Visa application data	Your immigration history (including residency, immigration status and travel history), character disclosures (including

	offences, disclosures and information relevant to meeting character requirements), health disclosures and information relevant to meeting health criteria.
Video	If video surveillance operates in or near our premises, we may capture images of you where permitted by law. We may also capture video of you if you attend an event organised by us where you have given your express consent for us to do so.

## Sensitive or special category personal data

During the recruitment process or in the course of the services we operate, we may collect personal data that is considered sensitive or special category data in certain countries we operate in. We will only collect sensitive personal data in accordance with the applicable data protection and privacy laws, including if you have given your explicit consent to handle this type of personal data or where we are required by law to collect such personal data.

## Children's data

The age at which an individual is regarded as a child differs per country. We do not typically collect personal data relating to individuals under 18 as our services are not intended for children.

## 5. How we collect personal data

The ways that we may collect your personal data broadly falls into the following categories:

### a) Information you provide us directly

We generally collect your personal data directly from you. For example, we collect your personal data when you:

- use our services, including submitting your CV, completing psychometric assessments or other assessments;
- deal with us in person or correspond with us whether online or offline, including by telephone, letter, fax, email or via our websites;
- register for newsletters via our website;
- register for, attend and/or otherwise take part in our events (e.g. at career fairs);

- download, subscribe or otherwise engage with KOMBA Talent content and publications, including subscribing to job alerts;
- enter a competition, promotion or survey we are conducting;
- visit our offices or premises;
- submit request for action, support or information, including giving us feedback via email or our website; or
- otherwise directly interact with us.

## b) Information that we automatically collect about you

When you visit our website, we collect certain information automatically from your device depending on the settings of your device or browser to help us measure traffic, usage trends and data analytics that assist us in improving our websites and services. Some of this information may be collected using cookies and similar tracking technology, as explained further under section ([Cookies and other technology](#)) of this Policy.

The information we collect automatically may include, IP address, location, browser type, and usage data about your activity on our websites, pages viewed and searches.

## c) Information that we obtain from third party sources

We may obtain personal data about you from the following third party sources:

- pre-employment screening and background checking organisations where permitted in the jurisdiction. We will only contact the references you have indicated during the application process and use of our services;
- our clients and their third party suppliers;
- governmental and regulatory bodies, such as tax and social security authorities;
- third party suppliers, including other recruitment and employment agencies, job board providers and job aggregators and our managed service providers who are within our supply chain;
- other recruitment agencies;
- analytics providers, such as Google Analytics and various job boards; and
- PR and communication platforms, such as Hubspot.

## d) Publicly available sources

We may also collect your personal data from publicly available sources where permitted by the applicable laws in the jurisdictions we operate in, including:

- your identity and historical data from social media sites, such as LinkedIn, X (formerly Twitter) and Facebook;

- your identity and contact data from company and commercial registers or electoral registers; and
- your identity, from qualification and membership lists of professional bodies.

## 6. How we use personal data

In general, we will only use your personal data as permitted by law. We will use the personal data we collect for the purposes set out in this Policy or for the purposes we explain to you at the time we collect your personal data. These include:

### a) For candidates

Your personal data will be collected and handled by us in order to:

- provide careers, recruitment and/or related intermediary services to or for you;
- match your details against job vacancies which we consider are appropriate for you in order to assess your suitability for them;
- allow you to submit your CV, apply for specific jobs or to subscribe to our job alerts so that we can notify you when relevant job vacancies arise;
- apply for jobs on your behalf by sending your personal data to clients;
- facilitate the recruitment process if a client wishes to progress your application;
- fulfil our contractual obligations to our clients;
- inform you about any relevant industry developments, events, promotions and competitions, and to communicate any other relevant information;
- answer your enquiries or questions;
- conduct talent surveys;
- conduct statistical analysis;
- monitor diversity;
- comply with our legal and regulatory obligations;
- pursue or defend a legal claim;
- conduct pre-employment screening;
- prevent or detect a crime, where the law requires us to carry out such monitoring;
- provide you with further information which may be of interest to you regarding the employment



market and opportunities;

- preparing and processing your visa application and related immigration services, where applicable; and
- enhancing and optimizing business operations, which may include analysing your engagement with our services and website to develop, improve and provide our services.

## b) For business contacts (personnel of our prospective clients, clients, prospective suppliers and suppliers)

In your capacity as a representative of the company that is a client, prospective client, supplier or prospective supplier of ours (as applicable), your personal data will be collected and processed by us in order to:

- provide recruitment and/or related intermediary services to the company you represent, including billing and account management purposes;
- facilitate the recruitment process for the company you represent;
- fulfil our contractual obligations with the company you represent;
- inform you about any relevant industry developments, events, promotions and competitions, and to communicate any other relevant information which we consider may be of interest to you in regard to the employment market and/or our services;
- respond to your enquiries or questions;
- conduct statistical analyses or surveys as the contact point of prospective clients and clients;
- comply with our legal and regulatory obligations;
- pursue or defend a legal claim;
- prevent or detect a crime, where the law requires us to carry out such monitoring; and
- enhancing and optimizing business operations, analysing your engagement with our services and website to develop, improve and provide our services.

## c) Website users

Your personal data will be collected and handled by us in order to:

- improve our customer service and the way we operate to ensure our services are useful and relevant to you (which includes tailoring our websites to suit your requirements);
- inform you know about our recruitment services across all areas of our business;
- send you communications where you have indicated you are happy to receive such information or have purchased products or services from us, which may include the following:
  - e-newsletters and hard copy newsletters;

- emails about the services we offer and new product launches;
- reminders when your products or services may be due for renewal; and
- opportunities to participate in market research.

Depending on the contact preferences you select, we will communicate with you by post, telephone, SMS, email or other electronic means such as via social and digital media. We may use your usage data to help ensure that this messaging is personalised and relevant to you.

#### d) Referees

We will use your personal data solely for the purpose of conducting a reference check on a candidate.

Where we need to collect and process your personal data by law, or under a contract we have entered into with you, and you fail to provide the required personal data when requested, we may not be able to comply with our legal obligations or perform our contract with you, including providing the services or information you have requested.

## 7. Who your personal data is shared with

Subject to local laws and regulations that apply to KOMBA Talent in the jurisdictions we operate in, we may disclose your personal data to:

- any company in the KOMBA brand;
- prospective employers or engagers;
- other recruitment companies or intermediaries involved in managing the supply of personnel;
- data processors of KOMBA;
- pre-employment screening and background checking organisations;
- your referees;
- your past employers and relevant education institutions;
- professional bodies you belong to or are accredited with;
- government and regulatory bodies, such as tax and social security authorities;
- third party suppliers and service providers, including job board providers and job aggregators and our managed service providers who are within our supply chain;
- to any other person or party with your express consent to disclosure; and
- third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.

Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business structure, any new owners may use your personal data in the same way as set out in this Policy.

We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions, which includes compliance with this Policy.

## 8. Legal basis for processing personal data

If you are located in a region that requires a legal basis for processing of personal data (such as the EEA, Switzerland or UK), we need a lawful basis pursuant to applicable law to collect, use and disclose your personal data where KOMBA Talent is a controller. Our legal basis will depend on the information concerned and the context in which it is processed.

Generally, KOMBA Talent will collect and use your information as follows:

Legal Ground	Permitted Purpose
<p>Consent - where you have given us consent to use your personal data for one or more permitted purposes.</p>	<p>For example:</p> <ul style="list-style-type: none"> <li>when you create a website account with us;</li> <li>when we are required by law to collect your explicit consent to process your personal data; and</li> <li>where you otherwise provide us with your consent.</li> </ul>
<p>Legal obligation - where we need to process your personal data to comply with a legal or regulatory obligation.</p>	<p>For example:</p> <ul style="list-style-type: none"> <li>to perform background checks in accordance with our legal obligations;</li> <li>to comply with our legal and regulatory requirements in relation to social security, taxation and financial compliance;</li> <li>for equal opportunities monitoring and reporting purposes;</li> <li>to co-operate with our regulators and other public authorities; and</li> <li>to comply with any other obligation to</li> </ul>

	which we are subject under applicable rules and law, including record keeping and data retention.
Contractual necessity - where we need to process your personal data to perform and fulfil our obligations to you under the contract, we are able to enter or have entered into with you.	For example: to employ/engage you if you are applying for a vacancy with us; and to enter into or perform our agreement with you if you are a supplier or external adviser.
Legitimate interests - where the processing of your personal data is necessary for the pursuit of our legitimate business interests and provided your interests and fundamental rights do not override our legitimate interests.	For example: to offer and provide our recruitment services to you and to assess your skills against our vacancies with our clients; to provide you with marketing material to aid your job search; to manage complaints and legal claims; to conduct appropriate background checks if you are to be employed/engaged by us; sharing your personal data with the companies that operated within the KOMBA brand; sharing your personal data with our third party services providers; and sharing your personal data with potential employers and our clients (including our MSP clients) who can offer job opportunities within their organisations.

Depending on our relationship with you, we may rely on one or more of the above legal basis for processing your data. If you would like to know what legal basis we rely upon to process your personal data, please contact us using the [contact form](#) on our web site.

## 9. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for or for as long as we have a valid purpose to do so, and in any case as permitted by applicable law, including to

comply with any legal, accounting, auditing or reporting requirements.

We view our relationship with you as being one which is to support your career through numerous roles and assignments. Accordingly, we may retain your data for a period of time which is materially greater than simply one placement if we reasonably believe that we will continue to have an ongoing relationship with you.

We will appropriately and securely dispose of your personal data when it is no longer required. To determine the appropriate retention period for personal data, we will consider the following factors:

- amount and nature of the personal data;
- its sensitivity;
- the potential risk of harm from unauthorised use or disclosure of the personal data;
- the purposes for which we handle your personal data;
- whether we can achieve those purposes through other means; and
- applicable legal requirements.

When we act as a data processor to our clients, the data controllers, we will retain your personal data in accordance with the retention periods prescribed by our clients.

## 10. Your rights

You may have rights under applicable law to request that we take certain actions in connection with personal data that we may have about you. Not all jurisdictions grant privacy rights, so whether or not you have any such rights, and the nature of those rights, are determined by multiple factors, including the country you are located in and the applicable privacy laws. These rights may include:

<b>Right</b>	<b>Description of Right</b>
Right to be informed	This is the right to be provided with clear, transparent and easy to understand information about what personal data we collect about you, how we use and protect such data, including the third parties to whom we disclose it to, and your rights. This is why we're providing you with the information in this Policy.
Right of access	You may be able to request a copy of your personal data and to obtain certain other information about how we handle and process it.

Right to have rectification/correction	You may be able to request modifications or corrections your personal data if it is inaccurate or incomplete.
Right of erasure	<p>You may be able to request that we delete your personal data that we hold (also known as the “right to be forgotten”). This right is not absolute, and there are circumstances where we may need to continue processing your data despite a request for erasure.</p> <p>We do not delete personal data from our back-up files that are created for disaster recovery purposes and are not easily accessible.</p>
Right to restrict handling and processing	You may be able to request that we restrict use of your personal data, which includes requesting us to suppress your personal data file.
Right to portability	You may be able to request a copy of your personal data in a structured, machine-readable format, to allow you to transfer your data to another organisation.
Right to object	You may be able to object to the processing of your personal data for certain purposes, in particular to personal data processed for direct marketing purposes and to personal data that is handled and processed for certain reasons based on our legitimate interests.
Right to withdraw consent	Where you have provided your consent to certain processing and no longer want us to use your data for that purpose (for example electronic marketing communications), you may withdraw your consent to this use at any time, although this will not affect the lawfulness of processing based on consent before its withdrawal.
Rights in relation to automated decision making	You may be able to request not to be subject to a decision based solely on automated processing where it has a legal effect on you or otherwise significantly affects you.
Right to complain	You have the right to complain to us or to the data protection authority in your country in relation to the handling of your personal data.

Please contact us using the [contact form](#) on our web site, if you wish to exercise any of your privacy rights.

We will respond to all legitimate requests we receive from individuals wishing to exercise the privacy rights applicable to them in accordance with applicable data protection laws, including within any legal timeframes.

Where permitted by law, you may be charged a fee to access your personal data or to exercise any other privacy right that may apply to you. We will let you know if a fee applies to your request before we complete it.

We may also request certain information to help us verify your identity, ensure your right to exercise any of privacy rights in the table above and to prevent your personal data being disclosed to any person who has no right to receive it.

## 11. Your choices about marketing and advertising

You have the right to opt-out of marketing communications that we send at any time. You can exercise this right through the through unsubscribe options available within the marketing communication itself or by contacting us using the [contact form](#) on our web site. Please note that:

- it may take us a short period of time to remove your contact information from our marketing communications lists, so you may receive correspondence from us for a short time after you make your request; and
- opting-out of receiving marketing communications not opt you out of receiving important business communications related to your current relationship with us, such as service announcements or security information.

## 12. Cookies and other technology

We use cookies and similar tracking technologies (collectively "[Cookies](#)") to collect and use personal data about you when you visit and navigate our website. You can find out more about Cookies, including how we use them and what choices are available to you, by reading our [Cookies Policy](#).

We may on occasion use technological filters to sort through the job applications we receive and to match candidates to specific job vacancies. If we have used technological tools to a significant extent when assessing your job application, we will inform you of this. Please let us know when we contact you if you feel there are other factors that we should consider as part of your job application.

## 13. Data security

We hold your personal data in a combination of secure computer storage facilities and paper-based files.

We have in place an appropriate level of security around your personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage to it.

We have implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risk of harm that might result from unauthorised or unlawful processing, accidental or unlawful loss, destruction or alteration, unauthorised (or disclosure of) access or damage to your personal data including:

- locks and security systems;
- encryption
- usernames and passwords;
- virus checking;
- auditing procedures and regular data integrity checks; and
- recording of file movements.

We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They must only process your personal data on our instructions and subject to the access controls listed above. They are also subject to a duty of confidentiality.

We have agreed on security-related measures with the third parties we share your personal data with to ensure that it is treated by those third parties in a way that is consistent with how we safeguard your personal data.

We have also put in place procedures to deal with any suspected personal data breach and will notify you and any applicable data protection authority where we are legally required to do so.

If you suspect any misuse, loss of or unauthorised access to your personal data, please contact us immediately using the [contact form](#) on our web site.

## 14. Personal data storage and transfer

As a global organization, we may store and process your data, including personal data, in the countries in which we operate or any other country in which KOMBA or its network companies or service providers maintain facilities or employ staff. KOMBA Talent may also need to transfer your personal data to our group companies, contractors, service providers, and to third parties in various countries and jurisdictions around the world, including Germany and Turkey. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective). In each case, we take care to use appropriate safeguards to ensure your personal data remains protected.

Due to the global nature of our business, we may need to transfer Personal Data outside the original territory in which the data was collected (“**Original Territory**”). For example, we may transfer personal data to a company or companies within the KOMBA brand or potential employers internationally in any of the countries listed above, and to service providers and government or public authorities in order to perform



our services and comply with our legal obligations.

If we do transfer Personal Data outside the Original Territory, we will make sure that such transfers are performed in compliance with applicable law. We, our service providers and/or the third parties to whom we may disclose Personal Data may transfer such data outside of the Original Territory with the appropriate safeguards.

## 15. Privacy policies of third parties

Our websites may contain links to other websites and services maintained by third parties. The privacy and data security practices of such third-party sites and/or services are determined by such third parties and governed by the privacy statements of those third parties, and not by this Privacy Policy.

This Policy explains how KOMBA handles your personal data. Please also read the privacy policies of the social media platforms and third party websites through which you arrive at a KOMBA Talent's website. We encourage you to read the privacy policies of these third parties before giving them your personal data.

## 16. Changes to this Policy

We may amend this Policy from time to time to reflect our current practices and ensure compliance with applicable laws. When we update our Privacy notice, we will take appropriate measures to inform you consistent with the significance of the changes we make. If we make changes to this Policy, we will revise the "Last Updated" date at the top of this Policy. We recommend that you visit this page from time to time to keep up to date with any changes.

## 17. How to contact us

If you have questions about this Policy, our privacy practices, or if you would like to submit a request exercising your privacy rights, please contact us immediately using the [contact form](#) on our web site.