

Privacy Notice: EU Candidates

PRIVACY NOTICE FOR CANDIDATES

Please note that in accordance with the General Data Protection Regulation (GDPR) this notice shall only apply to you if you are currently in the UK or EU dealing with our UK or US offices

This privacy notice does not apply to you if are dealing with our German offices. The notice that applies to you can be accessed [here](#).

This notice applies to current and former candidates, who we have either placed into a role on a permanent or temporary basis as a non-PAYE Interim or who have contacted us/we have contacted about a prospective job role. This notice does not form part of any contract to provide services and does not apply to you if you are engaged by us as a PAYE interim.

This privacy notice does not apply to you in your capacity of a client of ours. The notice that applies to our clients can be accessed via our Privacy Policy page.

References to **we, our** or **us** in this privacy notice are to the **Cobalt Consulting Group** (being **Cobalt Consulting Holdings Limited**, and each of its direct and indirect subsidiaries, trading under the "**Cobalt**" brand. Details of our main trading entities are as follows:

Cobalt Consulting (UK) Limited is a limited company incorporated in England and Wales. Registered Number: 04287243. Registered Office: 7 - 10 Chandos Street, London, W1G 9DQ.

Cobalt Deutschland GmbH is a limited company incorporated in Germany. Registered Number: HRB 133362 B. Registered Office: Uhlandstrasse 187, 10623 Berlin, Germany.

Cobalt Consulting, Inc. is a Corporation registered in Delaware, US. DOS ID: 5687313.
Office: 21W. 46th Street, Suite 805, New York, 10036, USA.

Comanos Consulting Ltd is a limited company incorporated in England and Wales. Registered Number: 15323378. Registered Office: 7-10 Chandos Street, London, W1G 9DQ

Comanos GmbH is a limited company incorporated in Germany. Registered Number: HRH 37452 P Registered Office: Dortustraße 40, 14467 Potsdam

- For real estate and construction
 - our **London** and **Manchester** offices operate through Cobalt Consulting (UK) Limited;

- Our **Berlin, Hamburg, Düsseldorf, Munich, Stuttgart** and **Frankfurt** offices operate through Cobalt Deutschland GmbH.
 - Our **New York** office operates through Cobalt Consulting, Inc.
- For renewable energy
 - Our **London** and **Manchester** offices operate through Comanos Consulting Ltd
 - Our **Bremen, Hamburg** and **Potsdam** offices operate through Comanos GmbH

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Data Protection Compliance Manager has overall responsibility for data protection compliance in our organisation.

Contact details are set out in the "**Contacting us**" section at the end of this privacy notice.

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your working relationship with us.

For the purposes of data protection, the company in our Group which is processing your personal information will be the controller of any of your personal information.

Your personal data may also be shared between the Group's offices and associated

entities as necessary or appropriate. Don't worry, we've put measures in place to keep your personal data safe whichever entity processes it.

1. PERSONAL INFORMATION

In order to support your career aspirations and source new job opportunities for you, you may provide us with or we may obtain personal information about you, such as information regarding your:

- personal contact details such as name, title, addresses, telephone numbers and personal email addresses ;
- date of birth;
- gender;
- identification documents such as passport/driving licence details (including copies where we are required to hold such information for identification purposes);
- employment history and location of current workplace, salary, annual leave, pensions and benefits entitlement;
- location of employment or workplace;
- attendance at any events we host or organise;

- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- recruitment records including references and other information included in a CV, cover letter or as part of the application process) and activities (including information about interviews, jobs applications and offers);
- details about how you use our website e.g. the pages you look at and how you use them, usernames and passwords;
- referee details, next of kin, beneficiaries, details of family members and emergency contacts.
- Where you are engaged by us as a non-PAYE interim, and we provide your services to our clients on a contract/service basis, then additionally we may hold the following additional information: financial details such as bank accounts and details of payment transactions with you;
- national insurance number and other tax or governmental identifiers; and
- work records (including timesheets, working hours, details of any new position, start date, leaving date and remuneration).

2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We generally do not collect the following “**special categories**” of more sensitive personal information:

- information about your political opinions;
- information about your trade union memberships;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information and disability information; and
- biometric information about you, for example fingerprints, retina scans.

In relation to the special category personal data that we do process we do so on the basis that:

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- based on your explicit consent.

In the table below, we refer to these as the “**special category reasons for processing of your personal data**”.

We may also collect criminal records information. For criminal records information in relation to you we process it on the basis of legal obligations or based on your explicit consent.

3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about candidates when you fill in forms on or upload a CV onto one of our websites or when you correspond with us by phone, e-mail or otherwise.

We also may collect personal information about candidates through other sources such as LinkedIn, job board websites, online CV libraries, personal recommendations and referrals, hiring platforms and through the use of business development tools.

Where you are an interim worker we may collect additional information from third parties including the client you are working for and any background check agencies.

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the **“Your rights in relation to personal information”** section below.

4. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose

Personal

Lawful basis

information used

Non-'special categories' of

Personal Information

<p>To assess your CV and qualifications (where you have provided us with/we have collected your personal information directly from you)</p>	<p>All your personal information excluding 'special categories' of personal information and criminal records information</p>	<p>We need this information to be able to perform and administer the recruitment process for you.</p>
<p>To provide you with information regarding job opportunities based on your CV and qualifications and other recruitment related services that may be of interest to you (where you have provided us with/we have collected your personal</p>	<p>All your personal information excluding 'special categories' of personal information and criminal records information</p>	<p>As above.</p>

information directly from

you)

To contact you with

All contact details

Where your personal

information regarding job

and all information

information has been

opportunities that may be of

contained in any CV

sourced indirectly from

interest to you based on

(including

either:

your CV and qualifications

employment and

(i) a hiring platform;

(where we have obtained

education history

your information from a

and location of

(ii) social media platform

third party source)

current workplace).

where you have selected

a function to let

recruiters know that you

are open to job

opportunities; or

(iii) a job board onto
which you have
uploaded your CV

we have a legitimate
business interest to do so
but you always have the
right to opt out from
receiving such
recruitment related
marketing at any time.

In all other cases, we will
only contact you with
information about job
opportunities where we
have your consent to do.

To manage our relationship with you including dealing with any support enquiries made by you	All your personal information excluding 'special categories' of personal information and criminal records information	To be able to manage and perform our contract with you
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To share your CV or details of your qualifications with a client in relation to potential job roles	All the non-'special categories' of personal information we collect for the purposes of the recruitment process.	We have a legitimate business interest to do so.
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To arrange an interview with/introduction to a prospective employer in relation to a particular job role and managing the introductory process, provided you have indicated that you are happy for an introduction to be arranged

All the non-'special categories' of personal information we collect for the purposes of the recruitment process.

We will only do so with your consent.

Storage of records relating to you and also records relating to our business such as your recruitment records and records of your interactions with us

All non-'special categories' of personal information

To be able to manage and fulfil our contract with you, we may have a legal obligation to do so and we also have a legitimate business interest to keep proper records.

Dealing with legal disputes involving you.

All your personal information excluding 'special categories' of personal information and criminal records information

We have a legitimate interest to ensure that all legal claims are managed effectively.

To send you information we think you might find useful or which you have requested from us, including other recruitment related information about our services and any events we are running.

Personal contact details

We may ask for your consent to process your data for this purpose, you may revoke your consent at any point.

Alternatively, if you have previously engaged with us (for example by

submitting a job application or CV to us) or requested this information from us previously, we may market these other recruitment related activities to you as a legitimate interest in developing our business.

You have the right to opt out from such marketing at any time.

To conduct data analytics studies to review and better understand market trends

All the personal information we collect for the

We have a legitimate interest in doing so to

within the recruitment industry purposes of the recruitment process excluding 'special categories' of personal information and criminal records information. ensure that our business is targeted and relevant.

Complying with health and safety obligations Personal identifiers e.g. when you sign it at one of our offices We have a legal obligation to comply with Health and Safety laws.

For the purpose of complying with any legal or regulatory requirements All the personal information about you excluding special category We may have a legal obligation to comply with certain requirements and we

information and
criminal records
data

have a legitimate interest
in complying with any
regulatory requirements

**‘Special categories’ of
Personal Information or
criminal records**

**Storage of records relating
to you and also records
relating to our business**

All ‘special
categories’ of
personal
information

We process special
category personal data
on the basis of the
“special category reasons
for processing of your
personal data” referred to
in section 2 above.

For criminal records
information we process it
on the basis of legal

obligations or based on

your explicit consent.

We will use and retain

Information about

For criminal records

information about criminal

your criminal

information we process it

convictions to comply with

convictions and

on the basis of legal

law and in order to

offences

obligations or based on

determine your eligibility to

your explicit consent.

undertake particular types

of work

Analysing diversity statistics

Information

Your explicit consent is

in the sector

collected in our

required when

“Diversity Survey”

completing the survey

which is completed

voluntarily by you

and held separate

from your

recruitment data

and only used in
anonymised form
for statistical
analysis

Interim Workers

Where you are engaged by us as a non-PAYE interim, then additionally we may also use your information as follows:

Purpose	Personal information used	Lawful basis
Making a decision about your appointment with our	All the personal information we collect for the purposes of the application process	We need this information to be able to perform and administer the

client and managing

recruitment process for

the process

you to engage you

This is necessary to enter

into a contract with you

To administer the

Personal identifiers and

contract we have

all the personal

entered into with you

information we collect

We need this information

and to facilitate our

for the purposes of the

to be able to perform and

payroll and invoicing

recruitment process.

administer our contract

processes

Working records.

with you.

All payment and

transaction details.

Assessing qualifications

All the personal

We may be legally

for a particular role or

information we collect

obliged to do so

job.

for the purposes of the
recruitment process

To be able to manage
and perform our contract
with you

We have a legitimate
interest to run and
manage our business and
to ensure that our
interims are suitable for
the roles we place them
into.

**To check you are legally
entitled to work in the
UK**

Personal contact details
and identification
documents and right to
work documentation

We may have a legal
obligation to do so and it
is also in our legitimate
business interest to
ensure that you are
suitable for a role.

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to engage you or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your engagement. For other personal information, whilst you may not be under an obligation to provide it to us, if you do not provide it then we may not be able to properly perform our contract with you.

You should be aware that you are not required under any contract with us to agree to any request for consent. 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 the "**Contacting us**" section below.

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. Withdrawing consent may also have the same effects as

not providing the information in the first place, for example we may no longer be able to provide certain services to you.

5. DIRECT MARKETING

Email, post and SMS marketing: from time to time, we may contact you by email, post or SMS with information about products and services we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by emailing info@cobaltrecruitment.com with the subject "unsubscribe". You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

6. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- **Companies in the same group of companies as us:** for the purpose of providing a service to you and as part of its regular reporting activities on Group

performance, for system maintenance support, hosting of data, for the purposes of data mapping and analysis of different recruitment markets and for cross-selling opportunities;

- **Any party approved by you;**
- **Other service providers to our business and advisors:** for example: payroll, email marketing specialists, business development tool providers, professional advisors, contractors, administration and IT services (including CRM and website service providers). All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information;
- **Purchasers of our business:** buyers or perspective buyers to whom we sell or negotiate to sell our business;
- **Prospective new employers:** our clients for the purpose of introducing you as a prospective new candidate;
- **Clients of our business:** where you are an interim worker who we are placing/have placed with a client.

- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives, for example HMRC or the Information Commissioner's Office; and
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

We do not disclose personal information to anyone else except as set out above.

7. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

Due to the international reach of our Group, each member of the Group will actively share personal data with other members of the Group as part of its regular reporting activities on Group performance, for system maintenance support, hosting of data, for the purposes of data mapping and analysis of different recruitment markets and for cross-selling opportunities. Therefore, the personal data we collect shall be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice and

applicable data protection laws and is respected and kept secure and where a third party processes your data on our behalf, we will put in place appropriate safeguards as required under data protection laws. For further details please contact us by using the details set out in the **"Contacting us"** section below.

Our directors and other individuals working for us may also in limited circumstances access personal information outside of the UK and European Union if they are working overseas or on holiday abroad outside of the UK or European Union. If they do so they will be using our security measures and will be subject to their arrangements with us which are subject to English Law and the same legal protections that would apply to accessing personal data within the UK.

In limited circumstances the people to whom we may disclose personal information as mentioned in the section **"Disclosure of your personal information"** above may be located outside of the UK and European Union. In these cases, we will impose any legally required protections to the personal information as required by law before it is disclosed.

If you require more details on the arrangements for any of the above, then please contact us using the details in the **"Contacting us"** section below.

8. HOW LONG WE KEEP PERSONAL INFORMATION FOR

The duration for which we retain your personal information will differ depending on the type of information and the reason why 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 in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement, we retain all physical and electronic records for a period of 6 years after your last contact with us.

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 website. Alternatively, you can contact us by using the details set out in the "Contacting us" section below.

9. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;

- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your

personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of 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://ico.org.uk/for-the-public/>.

To find out how to access the personal information we hold about you, [go here](#).

To find out how to request the deletion of your personal information, [go here](#).

To exercise any of the other rights outlined in this section, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

10. CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

11. CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please email info@cobaltrecruitment.com or write to us at Data Protection Compliance Manager, 7 - 10 Chandos Street, London, W1G 9DQ.

Version dated . **21st June 2024**