

## **Privacy Notice For Individuals Not Covered by a Specific Privacy Notice**

Please note that in accordance with the General Data Protection Regulation (**GDPR**) this notice is only intended to apply to you if you reside in the European Union or United Kingdom, dealing with our UK or US offices. In all other cases this notice is not intended to apply to you as we are not legally required to adhere to our privacy notice obligations under GDPR for non-EU or UK based citizens. That said, we do take data protection very seriously and therefore endeavour to adhere to the terms of this privacy notice in respect of everyone affected by our activities as a recruiter

This notice applies to you if we process your personal information and you are not an employee or worker of ours, a prospective candidate employee or worker, a candidate we are looking to place into a job or an individual to whom we have provided a specific privacy notice. You may be, for example, an individual that works at a supplier or client or another organisation that we deal with, an attendee at one of our marketing events, or a user of our websites or someone else who is affected by our activities.

References to **you, your** and **yourself** in this privacy notice are to either you as an individual or any organisation that you work for.

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

- o Our London and Manchester offices operate through Comanos Consulting Ltd
- o Our Bremen, Hamburg and Potsdam offices operate through Comanos GmbH

This privacy notice also covers any joint venture companies, bodies or organisation that we have an interest in and to which you are seconded, carrying out activities on behalf of or are appointed as one of its officers or representatives.

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 relationship with us. This

notice explains how we comply with the law on data protection and what your rights are.

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 WE COLLECT**

We may collect the following types of personal information about you:

- **Contact details:** information that allows us to identify and contact you directly such as your name, address email address, telephone number and addresses.
- **Identification information:** passport and other official identification details, information from a third-party money laundering check provider, Companies House information, national insurance number, membership of relevant schemes.
- **Details of your work history:** This may include positions, roles, responsibilities, professional qualifications.

- **Personal history and information:** This includes hobbies, interests, marital status, family details and dietary requirements.
- **Advisors appointed by you:** including, lawyers, financial advisors, surveyors.
- **Business information:** including property owned by you, transactions, amounts paid or owed and tenants.
- **Responses to surveys, competitions and promotions:** we keep records of any surveys you respond to or your entry into any competition or promotion we run.
- **Creditworthiness:** We may undertake investigations into your creditworthiness in order to establish whether to enter into or continue a business relationship with you or the organisation you work for.
- **Details of your performance:** when working with or for us or in relation to any project or work we are engaged in.
- **How you use our websites:** we collect information about the pages you look at and how you use them, usernames and passwords.
- **Videos, photographs and audio recordings:** which you or other people take and provide to us or we take ourselves.
- **Your usage of the IT systems we make available to visitors to our premises:** for example, our client internet and Wi-Fi facilities.

- **Details of the correspondence (including e-mail correspondence) you send and receive from us and details of any claims:** this includes letters and emails, SMS, MMS and other electronic communication and may in some cases include audio recording of telephone conversations.
- **Subscription information:** for example, when you subscribe to one of our blogs, newsletters or other materials.
- **IP address information:** your computer's IP address allows us to track your usage of our websites.

## **2. SPECIAL CATEGORIES OF PERSONAL INFORMATION**

We generally do not collect, store and use the following “special categories” of more sensitive personal information regarding you:

- 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
- biometric information about you, for example fingerprints, retina scans.

If we do collect any special category personal information, we do not currently rely on consent as a basis for processing special category personal information.

We will also not collect, store and use any criminal records information in relation to you. If we do collect any criminal records information, we do not currently rely on consent as a basis for processing criminal records information.

### **3. SOURCES WE COLLECT YOUR PERSONAL INFORMATION FROM**

We will collect personal information from a number of sources. These may include the following:

- **Directly from you:** when you indicate that you may wish to attend an event, complete forms we provide to you, use our websites, enter our competitions and promotions, make a claim, make a complaint, provide money laundering information to us contact us by phone, email or communicate with us directly in some other way.
- **From referrals and recommendations:** usually given by other people who know you or have a working relationship with you.
- **Organisations we work with:** in relation to joint or sponsored events;

- **Our websites:** provides us with information about how you use it and the devices that you use to connect to our websites.
- **Providers of information:** which may include professional bodies or trade associations, credit reference agencies, money laundering check provider, Companies House, the Land Registry, LinkedIn and other web platforms.
- **Journalists or other investigators:** they may provide us with details or make enquires about you or matters concerning you or ourselves.
- **Your employer or the organisation you work for:** they may provide us with your name, position contact details and background information about you.
- **Our professional advisors:** such as lawyers, accountants, financial advisors, consultants and other advisors.
- **Your professional advisors:** such as lawyers, accountants, financial advisors, consultants and other advisors.
- **The Government, local authorities or relevant regulators:** to assist with investigations, for example the Information Commissioner's Office or HMRC.

We will also collect additional personal information throughout the period of our relationship with you.



If you are providing information regarding other individuals to us, it is your responsibility to ensure that you have the right to provide the information to us.

If you are providing us with details about other individuals they have a right to know and to be aware of 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. WHAT WE USE YOUR PERSONAL INFORMATION FOR**

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. Which will apply will depend upon the nature of your relationship and interactions with us.

**Purpose****Personal****Lawful basis****information used**

**Carrying out identity and credit checks**

Contact details and payment information

We may have a legal obligation to undertake identification

We also have a legitimate interest in knowing your identity and carrying out money laundering checks and ensuring that we are likely to be paid

**Anti-money laundering checks**

We may have a legal obligation to undertake anti-money laundering checks

**Enter into and perform contracts, where we may be supplying products/services to you and/or you may be supplying products/services to us or we may be involved in similar arrangements with third parties**

All the personal information we collect

To enter into and perform contracts with either yourself or the organisation that you represent

We have a legitimate to properly perform contracts with third parties

Deal with your queries or complaints, claims, legal disputes or raise queries, claims, legal disputes or complaints with you or the organisation you work for

All the personal information we collect

This may be necessary to perform a contract with you or the organisation that you represent

We have a legitimate interest to improve the

services and/or products

we provide

To defend, bring or

establish legal claims

Maintain and improve our  
services and/or products

All the personal  
information we  
collect

We have a legitimate  
interest to improve the  
services and/or products  
we provide

Data analytics, statistical  
analysis and other research  
to help us improve our  
online services

How you use our  
websites

We have a legitimate  
interest to improve the  
online services we  
provide and user  
experience

Security of our IT systems

All the personal  
information we  
collect

We have a legitimate  
interest in ensuring the  
security of our IT systems

Staff training

All the personal  
information we  
collect

We have a legitimate  
interest to improve the  
products and services we  
provide

Direct marketing

Contact details and  
services and products  
that we have  
determined may be  
of interest to you or  
your organisation  
and/or which you or  
your organisation has  
purchased in the past

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

Alternatively, if you or  
your organisation have  
purchased similar  
services from us  
previously we may  
market similar products  
or services as a

legitimate interest in  
developing our business.

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

Events we hold or sponsor

Your contact details,  
details of attendance,  
your comments in  
response forms and  
dietary requirements  
and images

We have a legitimate  
interest in holding events  
and tracking attendance  
and providing  
appropriate food and  
drinks at events

We may also have a legal  
obligation to comply  
with health and safety  
requirements

To comply with our legal obligations	All the personal information we collect	To comply with any legal obligations or requirements
To manage our relationship with you or the organisation you work for and to operate and manage our business and internal reporting	All the personal information we collect	We have a legitimate interest to operate our business in an efficient way and to expand our business
		To enter into and perform contracts with either yourself or the organisation that you represent
Storage of records relating to you and also records relating to our business	All the personal information we collect	To be able to manage and fulfil any contract with you, we may have a

legal obligation to do so

and we also have a

legitimate interest to

keep proper records

For some of your personal information you may 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 properly perform our contract with you or the organisation you represent or comply with legal obligations and we may have to terminate our relationship. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our arrangements with you or the organisation you represent.

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. We will generally only ask for your consent for direct marketing.



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 marketing information to you.

We may anonymise and aggregate any of the personal information we hold (so that it does not directly identify you). We may use anonymised and aggregated information for purposes that include testing our IT systems, research, data analysis, improving our site and developing new products and services.

## **5. Who we share your personal information with**

We may share personal information with the following parties:

- **Organisations in the same group as us:** in relation to joint events or joint work.
- **Other companies in our supply chain:** so that they can contact you about any issues in the supply chain or where your personal information is relevant to a subcontractor or party above us in the supply chain.

- **Credit reference and other identification agencies:** so that we can assess your creditworthiness and to verify your identity. These agencies may retain a footprint that a search has been undertaken.
- **Third parties who ask for or want referrals:** we may provide your details to a third party who is seeking services/products which are the same or similar to those that you provide.
- **Marketing and public relations companies:** to help us to develop, carry out and assess marketing and PR campaigns
- **Other service providers and advisors to us:** such as companies that support our IT, help us analyse the data we hold, process payments, send communications to our customers, provide us with legal, property or financial advice and generally help us deliver our services to you or the organisation that you represent or for us to purchase them from you or the organisation you represent.
- **Information providers:** which may include credit reference agencies, money laundering check provider, Companies House, the Land Registry.
- **Purchasers of our business:** buyers or perspective buyers to whom we sell or negotiate to sell our business.

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

We also use Google Analytics which sets cookies to collect information about how visitors use our websites. We use the information to compile reports and to help us improve the websites. The cookies collect information in an anonymous form, including the number of visitors to the website and blog, where visitors have come to the website from and the pages they visited. To opt-out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

We may provide third parties with aggregate statistical information and analytics about users of our products and services, but we will make sure no one can be identified from this information before we disclose it.

We do not disclose personal information to anyone else except as set out above unless we have your consent, or we are legally obliged to do so. We do not sell, rent or trade your data.

## 6. Direct Marketing

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

We will only send marketing messages to you in accordance with the marketing preferences you set when you create your account or that you tell us afterwards you are happy to receive or where you or the organisation you represent have purchased similar services or goods from us previously.

You can then let us know at any time that you do not wish to receive marketing messages by sending an email to us at [info@cobaltrecruitment.com](mailto:info@cobaltrecruitment.com) or by using the by using the details set out in the **“Contacting Us”** section below. You can also unsubscribe from our marketing by clicking on the unsubscribe link in any marketing messages we send to you.

## 7. Transferring your personal information internationally

Due to the international reach of our Group, each member of the Group shall share certain 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 information we collect will 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 in limited circumstances access personal information outside of the UK and European Union if they work or are 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 **“Who we share your personal information with”** section 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 do we keep personal information for**

We will keep your personal information for as long as is necessary for the purpose for which it has been obtained and then for as long as there is any risk of a potential claim, which will be dependent upon the limitation period for the particular type of claim. We have set out below the main retention periods which will apply:

- For individual contacts at customers and suppliers this will be for as long as we continue to have a relationship with that customer or supplier and then for a period of 6 years afterwards.

- Where you or the organisation you work for have not yet become a customer and we are only engaged in marketing to you, we will retain your details for a period of 6 years since our last interaction, unless you or the organisation you work for later becomes a customer;
- For website users it will generally be a period of 2 years after you used our websites.
- For individuals seeking information, making complaints or otherwise corresponding with us it will generally be 6 years.
- For individuals attending an event it will generally be a period of 6 years after the event.

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 position or work for a different organisation or change your phone number or email address. you can contact us by using the details set out in the “Contacting Us” section below.

## **9. Security**

We have numerous security measures in place to protect the loss, misuse and alteration of information under our control, such as passwords and firewalls. We cannot, however, guarantee that these measures are, or will remain, adequate. We do, however, take data security very seriously and will use all reasonable endeavours to protect the integrity and security of the personal information we collect about you.

## **10. Your rights in relation to your 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.

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.

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 exercise any of the above rights, 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.

## **1. 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 notice. 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.

## **2. CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email [info@cobaltrecruitment.com](mailto:info@cobaltrecruitment.com) or write to us at: 7 - 10 Chandos Street, London, W1G 9DQ.

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