

# PRIVACY NOTICE FOR CLIENTS AND POTENTIAL CLIENTS OF SQUARE ONE – MAY 2018

Square One Resources Limited (“Square One”) is committed to protecting and respecting your privacy.

This policy sets out the basis on which your personal data will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how it will be treated by us.

For the purpose of the General Data Protection Regulations (the “Regulations”) the data controller is: Square One Resources Limited (company registration number 03110911) of 6 Devonshire Square, London, EC2M 4YE.

Square One are not required by the GDPR to have a Data Protection Officer, however, for any queries relating to your data, please direct your queries to Paul Savill, CFO, who will be able to deal with your query, or redirect to the appropriate person in Square One’s Data Protection team. Both Paul and the Team are contactable through the dedicated email address: [gdpr@squareoneresources.com](mailto:gdpr@squareoneresources.com).

## DATA PRIVACY PRINCIPLES

The core data privacy principles below are the foundation of this policy:

### Lawfulness, fairness and transparency

Square One shall process personal information fairly, and in accordance with this policy and applicable laws.

### Data Accuracy

Square One will take all reasonable steps to ensure that personal information is accurate and complete and will rectify or erase any incorrect personal information without delay.

### Purpose Limitation

Square One will ensure that personal information collected is for specified, explicit and legitimate purposes and only to the extent necessary to fulfil those purposes.

### Data Retention

Square One will only keep personal data for as long as is necessary to fulfil the purposes for which it was collected or to comply with applicable law/for tax purposes/for Government or regulatory requirements.

### Data Security

All personal information collected will be processed in a secure manner.

## PURPOSE AND LAWFUL BASIS OF PROCESSING

This policy is intended to be relevant to clients or potential clients of Square One. If this is not you, please refer to the relevant policy.

If this is the relevant policy for you, Square One will be acting as the recruitment business/agency (as defined by the Conduct Regulations) and we will need to take those reasonable and legal steps to ensure that we comply with our obligations in that capacity. Our basis for “processing” your data will either be with your consent or in accordance with our legal obligations or legitimate business interests as a recruitment agency.

Square One will only collect and use information as described in this policy or as expressly advised to you. Depending on the nature of the information, we will process data in order to comply with applicable laws and regulations relevant to Square One's business. In addition to this, where the apparent processing appears to go beyond legal or governmental requirements, Square One will be processing information in accordance with our "legitimate interests" where we have determined that such interests are not overridden by your interests or fundamental rights and freedoms.

## Reason for collecting information

In pursuit of these "legitimate interests", Square One will process information relevant to our business and in order to be able to provide professional services to you. Your data will be used by us our capacity as an:

- employment business (as defined by the Conduct Regulations): to provide independent, genuinely self-employed, qualified contract personnel to supply services to you on a time and materials basis; or
- employment agency (as defined by the Conduct Regulations): to supply permanent staff to you.

## Information we may collect

We may collect and process the following data about you:

- Information that you provide when entering into Agreements with Square One to allow us to provide you with our services. This includes your name, address and any other information provided at the time of agreeing terms.
- Information that is available to Square One either publicly or through such services as job boards and social media accounts.
- Where we are or propose to provide our professional services to you, such relevant information including your contact information, professional information (such as your job title and particular skills), right to work documentation (if applicable), If you contact us, we may keep a record of that correspondence.
- Square One may also ask you to complete surveys that we use for research purposes, and other marketing campaigns although you do not have to respond to them.
- Details of your visits to our site and the resources that you access.
- Information necessary to continue a professional relationship.

## How long will we store data?

This will depend on a number of factors, but will centralise around the nature of our relationship with you. For each category of data, we have considered the manner in which we process data against the rights and freedoms of the individual to ensure that we are acting reasonably and proportionately.

Broadly speaking there are two scenarios that will determine the timeframes for retention of data:

- Legally/financially - For example, in accordance with standard accounting practice, we will retain finance related data, such as records of payments, invoice details, etc. for a period of 7 years unless, in the unlikely event, there are mitigating factors that allow us to keep data for longer.
- Commercially – for legitimate business reasons we will retain data for **a reasonable period of time** where we may need to contact you in the future.

## We may disclose your personal information to third parties:

- in the event that we sell or buy any business or assets in which case we may disclose your personal data to the seller or buyer of such business or assets;

- if Square One Resources Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will of course be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or in order to enforce or apply our Terms and Conditions and other agreements; or protect the rights, property, or safety of Square One Resources Limited, our customers, or others. This may include exchanging information with other companies and organisations for fraud protection and credit risk reduction. We may from time to time use your data to carry out reference and security checks. Where potential employers require us to assist them in the carrying out of criminal record searches or police checks you agree that we have the right to use your data for this purpose.

## Your rights

You have the right to request us not to disclose any of your personal data or information or to pass information to third parties as well as the following:

- Review of the information we hold about you;
- Correction of this information if it is factually wrong;
- Erasure of your personal data or restrict the processing concerning of personal data concerning to you under certain circumstances;
- Provision of copies of the personal data which you have provided us via the forms, in a structured, commonly used and machine-readable format.

We will usually inform you before collecting your data, if we intend to disclose your information to any third party and you can exercise that right by contacting us at [gdpr@squareoneresources.com](mailto:gdpr@squareoneresources.com). In addition, should you feel that Square One have misused your data or in breach of the GDPR, you should also feel free to contact the ICO.

Following the introduction of the GDPR, you will have additional rights including the right to be forgotten and to data rectification.

Our site may from time to time contain links to and from our advertisers', partners' and affiliates' websites. If you follow a link to their sites, please note that these sites have their own privacy policy and that Square One Resources Limited does not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these sites.

Questions about this privacy policy can be addressed to [gdpr@squareoneresources.com](mailto:gdpr@squareoneresources.com)