

## **WE Talent Privacy Policy**

WE Talent is committed to protecting and respecting your privacy and security of your personal data.

This Privacy Policy describes how we collect, use and process your personal data, whether we are in the process of helping you find a job, continuing our relationship with you once we have found you a role, providing you with a service, receiving a service from you, or if you are visiting our website.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

We may amend this Privacy Policy from time to time. Please visit this page regularly if you want to stay up to date, as we will post any changes or updates to this Privacy Policy on our website.

### **1. Who we are:**

We are Workforce Employment Solutions Talent Limited trading as “WE Talent”, a limited liability company incorporated in England and Wales with registration number 14169424 and whose registered address is 25 Balham High Road, London, SW12 9AL (hereafter “WE Talent”, “we”, “us” or “our”). Any references to the “website” in this Privacy Policy is the website available at [www.we-talent.co.uk](http://www.we-talent.co.uk).

WE Talent is a recruitment agency and, for the purposes of the UK GDPR, is acting as a data controller when processing your personal data. Our ICO registration number is ZB347797.

Our nominated Data Protection Representative (DPR) is Victoria Cooper and the DPR’s contact details are: [hello@we-talent.co.uk](mailto:hello@we-talent.co.uk).

### **2. Who this policy applies to:**

This Privacy Policy applies to the personal data of our:

- **Candidates:** includes applicants for all roles advertised or promoted by WE Talent as well as people who register as a candidate via our website (whether or not in relation to a specific role). Candidates also include temporary workers, contractors and freelancers who we may supply onto our clients for temporary assignments.
- **Clients:** our customers, clients and prospective customers and clients to whom we provide or market our recruitment services in the course of our business.
- **Suppliers:** any company or other business (including sole traders, contractors and/or consultants) who provide services to WE Talent Limited (whether directly or for the benefit of our clients). The Supplier will be responsible for communicating this Privacy Policy to its own employees.
- **Additional Contacts:** these may include candidates’ and WE Talent employees’ emergency contacts and referees. We will only contact these individuals in appropriate circumstances.
- **Website Users:** any individual who accesses this website.

This privacy policy does not apply to WE Talent employees who will be issued with separate fair processing information.

### 3. What kind of personal data do we process?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been anonymised.

#### a. Candidate Data:

In order to provide you the best possible service in supporting you with your career and in finding a new role, we need to process certain information about you. Depending on the relevant circumstances, we may collect some or all of the information listed below to enable us to offer you employment opportunities which are tailored to your circumstances and your interests. Please note that the below list of categories of personal data we may collect is not exhaustive.

- Name
- Address
- Email and other contact details
- Date of birth
- Job history (including information relating to placements through us)
- Educational history, qualifications & skills
- Visa and other right to work or identity information
- Passport
- Bank details
- National insurance and tax (payroll) information
- Next of kin and family details
- Contact details of referees
- Personal information relating to hobbies, interests and pastimes
- Information contained in references and pre-employment checks from third parties
- Other special category data such as health records (see 'Special category data' section below)
- Your marketing preferences
- Any other information that you choose to provide to us
- Any information that your referees choose to provide to us about you
- Other information that our Clients may provide to us about you, or that we find from other third-party sources such as job sites;
- Details about your current remuneration, pensions and benefits arrangements;
- Information on your interests and needs regarding future employment, both collected directly and inferred, for example from jobs viewed or articles read on our website;
- Employment records (including job titles, work history, working hours, training records and professional memberships)
- References and other information included on your CV or Cover Letter
- IP address
- The dates, times and frequency with which you access our services.

Where appropriate or necessary (and in accordance with legal requirements) we may also collect information related to your health or details of any criminal convictions, where this is required for a role that you are applying for. We may ask you to provide diversity information, on a voluntary basis, including racial or ethnic origin, religious or other similar beliefs, and physical or mental health, including disability-related information, for the reasons and in the circumstances set out below. To the extent that you access our website we will also collect certain data from you.

#### b. Client Data:

We need to collect and use information about WE Talent clients, or individuals at your organisation, to be able to provide you with our recruitment services (e.g. finding the right Candidate for your business) or notifying you of content published by WE Talent which is likely to be relevant and useful to you. We generally only need to have your contact details or the details of individual contacts at your organisation (such as their names, telephone

numbers and email addresses) to enable us to ensure that our relationship runs smoothly. We also hold information relating to your online engagement with material published by WE Talent, which we use to ensure that our marketing communications to you are relevant and timely. We may also hold extra information that someone in your organisation has chosen to tell us.

#### **c. Supplier Data:**

We process information from our Suppliers to ensure our relationship and the services you provide to us operate efficiently. Personal data we collect includes contact details (such as email addresses, names and telephone numbers) of relevant contacts at your organisation so that we can communicate with you. We also need other information such as your bank details so that we can pay for the services you provided (if this is part of the contractual arrangements between us).

#### **d. Additional Contacts:**

This could include referees or emergency contacts. We need this information to support our Candidates to find a relevant career opportunity safely and securely, and to provide for every eventuality for our Candidates and our Employees. We will obtain basic contact details (such as name, email address and telephone number), so that we can contact you either for a reference or because it has been communicated with us that you are an emergency contact for one of our Candidates or current/prospective Employees.

#### **e. Website Users:**

We collect a limited amount of data from our Website Users which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as, the frequency with which you access our website, how you use our website, the browser type, the location you view our website from the language you choose to view it in, and the times that our website is most popular.

### **4. How do we collect your personal data?**

#### **a. Candidate Data:**

There are three main ways in which we collect your personal data:

- Personal data that you provide to us directly.  
WE Talent collects personal data from you to enable us to provide you with our recruitment services and so we can contact you about relevant job opportunities and any additional services that we offer. The ways you share your data with us may include:
  - Entering your details on the WE Talent website or via an application form/through registration;
  - Leaving a hard copy CV at an WE Talent event, external events or at our office;
  - Emailing your CV to an WE Talent consultant or meeting with them;
  - Applying for jobs through a job board, which then redirects you to the WE Talent website; or
  - Entering your personal details into an WE Talent microsite
- Personal data that we receive from additional sources e.g. third parties. This may include personal data received in the below circumstances:
  - Your referees may disclose personal information about you;
  - We may obtain information about you from searching for potential Candidates from third party sources, such as job boards and networking sites (e.g LinkedIn);

- WE Talent Clients may share or disclose personal information about you to us;
- Our Suppliers may share or disclose personal information about you to us, if you are using their services (such as umbrella companies)
- If you connect with us on social media e.g. by liking our posts or following us on a social media channel, we will receive your personal information from these channels.
- Where we obtain your information through LinkedIn or other business networking sites (for example where you choose to connect with one of our consultants), you will be able to view our Privacy Policy via our website before deciding whether to connect with us.
- Personal data collected automatically. When accessing our website or reading/viewing an email from us, we may also collect your data automatically or through you providing it to us. For more information see “How do we use your personal data” section below

#### **b. Client Data:**

We collect Client personal data in the following 3 ways:

- Personal data that we receive directly from you:

You may contact us proactively, usually by phone or email; and/or where we contact you, either by phone or email, or through our consultants’ business development activities.

- Personal data that we receive from other sources:

Where appropriate, we may seek more information about you or your colleagues from other sources generally by way of due diligence or other market intelligence including:

- From third party market research and by analysing online and offline media (either WE Talent directly or through engaging other organisations to support us to do so);
- From delegate lists at relevant events; and
- From other limited sources and third parties (for example from our Candidates providing us with contact information for referee purposes)
- Where we obtain your information through LinkedIn or other business networking sites (for example where you choose to connect with one of our consultants), you will be able to view our Privacy Policy via our website before deciding whether to connect with us.
- Personal data we collect via our website:

Through accessing our website or reading/viewing on an email from us, we may also collect your data automatically or through you providing it to us.

#### **c. Supplier Data:**

We collect your personal data when we work with you, this information will usually be provided to us directly by you.

#### **d. Additional Contacts:**

This is collected when candidates or employees/prospective employees provide us with your contact details as they have stated you as their emergency contact or referee.

## e. Website Users:

When you visit our website there is certain information that we may automatically collect, whether or not you decide to use our services. This includes your IP address, the date and the times and frequency with which you access the website and the way you browse its content. We will also collect data from you when you contact us via the website.

We collect your data automatically via cookies, in line with cookie settings in your browser. For more information, please see our Cookie Policy. If you are also a Candidate or Client of WE Talent, we may use data from your use of our websites to enhance other aspects of our communications with our service to you.

## 5. What legal bases do we rely on to process your personal data?

We must have a legal basis to process your personal data. The legal bases we rely upon are:

- Where we have a legitimate interest in processing your personal data
- To fulfil a contractual obligation that we have with you
- To comply with a legal obligation that we have
- Your consent

More information about the legal bases for processing can be found on the ICO website (<https://ico.org.uk>).

## 6. How we use your personal data.

This section details what information we collect about you, for what reasons, and which legal basis we rely on for such processing.

### a. Candidate Data:

We mainly use your personal details for providing our recruitment services to you, as well as marketing activities and on occasion for diversity monitoring. Where necessary, we will ask for your consent to complete some of these. See further information below on these activities.

Recruitment Activities: We use and process your personal data, to support you in finding the right career opportunity with the right business. Information for recruitment activities is used in the following way:

Why and how we process your information	Types of personal data used	Legal basis relied upon
Collecting and processing data to the extent necessary to determine whether you might be interested in or benefit from our recruitment services, including by: <ul style="list-style-type: none"><li>• collecting data from Candidates and other sources, such as a job board or LinkedIn</li><li>• storing Candidates' details on databases to assess their suitability for our vacancies</li></ul>	<ul style="list-style-type: none"><li>• Key identification and contact information</li><li>• Education and employment information</li><li>• Additional information that you choose to tell us</li><li>• Information that others provide about you</li><li>• Automatically collected information</li></ul>	Legitimate interests
Reviewing your information, and communicating with you, to ascertain how WE Talent may be able assist in your job search	<ul style="list-style-type: none"><li>• Key identification and contact information</li><li>• Additional information that you choose to tell us</li></ul>	Legitimate interests
Sending you job alerts or other communications (emails, texts, WhatsApp messages) with details of vacancies that we think may be suitable for you	<ul style="list-style-type: none"><li>• Email address</li><li>• Telephone number</li></ul>	Legitimate interests

<p>Once we have agreed terms with you (in order for us to provide our recruitment services to you), we will continue to process your personal data in the provision of our recruitment services and facilitating the recruitment process</p>	<ul style="list-style-type: none"> <li>• Education and employment information</li> <li>• Additional information that you choose to tell us</li> <li>• Information that others provide about you</li> </ul>	<p>Performance of our contract with you</p>
<p>Processing your personal data to facilitate payroll, if you undertake a temporary assignment via We Talent</p>	<ul style="list-style-type: none"> <li>• Key identification and contact information</li> <li>• Education and employment information</li> <li>• Financial information</li> </ul>	<p>Performance of our contract with you</p>
<p>Carrying out Candidate satisfaction surveys, or market research which we will use to inform our marketing materials and other informational materials such as whitepapers, reports and articles. To the extent that any data is published, this will be in aggregated/anonymised form only</p>	<ul style="list-style-type: none"> <li>• Key identification and contact information</li> <li>• Additional information that you choose to tell us</li> </ul>	<p>Legitimate interests</p>
<p>Providing you with details of ancillary services to recruitment services</p>	<ul style="list-style-type: none"> <li>• Key identification and contact information</li> <li>• Additional information that you choose to tell us</li> <li>• Information that others provide about you</li> <li>• Certain automatically collected information e.g. User choices and information about your use of these services</li> </ul>	<p>Legitimate interests</p>
<p>Processing Candidates' data in the course of carrying out our contractual obligations for Clients</p>	<ul style="list-style-type: none"> <li>• Key identification and contact information</li> <li>• Education and employment information</li> <li>• Financial information</li> <li>• Information that others provide about you</li> <li>• Additional information that you choose to tell us</li> </ul>	<p>Legitimate interests</p>
<p>Verifying details that a Candidate has provided or to request information (such as references and qualifications)</p>	<ul style="list-style-type: none"> <li>• Key identification and contact information</li> <li>• Education and employment information</li> <li>• Information that others provide about you</li> <li>• Additional information that you choose to tell us</li> </ul>	<p>Legitimate interests</p>
<p>Verifying a Candidate's identity and/or right to work</p>	<ul style="list-style-type: none"> <li>• Key identification and contact information</li> <li>• Additional information that you choose to tell us</li> <li>• Information that others provide about you</li> </ul>	<p>Legal obligation</p>
<p>Carrying out assessment and development activities such as psychometric evaluations or skills tests</p>	<ul style="list-style-type: none"> <li>• Key identification and contact information</li> <li>• Additional information that you provide or choose to tell us during the</li> </ul>	<p>Legitimate interests</p>

	evaluation/skills test (including in relation to your performance)	
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**Marketing Activities:**

From time to time we may send you marketing information that we feel may be of interest to you, or to ask for assistance with roles we are recruiting for e.g. asking for referrals. In relation to marketing information relating to specific roles or vacancies, we rely on legitimate interests, since you have already expressed an interest in WE Talent providing you with its recruitment services.

For all other marketing activities, we will request your consent. Such activities may include:

- sending you information or details of relevant market insight, promotions, offers, networking and additional events, and further relevant information which we think might be of interest to you;
- hosting promotional content from your details on WE Talent’s website(s) e.g. a testimonial (only where we have obtained your express consent to do so);
- providing you with information about certain discounts and offers that you may be eligible for as a result of your relationship with WE Talent.

If you have given us your consent for marketing communications, you can opt-out any time by clicking on the “unsubscribe” button of any marketing email we send to you, or by contacting our Data Protection Representative.

Please be aware that even if you have opted out from our marketing communications, it may be the case that your details may be recaptured through public sources in an unconnected marketing campaign. We will do our best to ensure this does not happen, if it does please opt out again.

**Special category data (previously called sensitive personal data):**

We may collect special category data about you, such as details of your ethnicity, gender, age, sexual orientation, religion or other similar beliefs for diversity monitoring. We may also process health-related information and/or details of your criminal convictions if we are required by our clients to carry out such checks.

<b>Why and how we process your information</b>	<b>Types of personal data used</b>	<b>Legal basis relied upon</b>
Equal opportunities monitoring	Details of racial or ethnic origin, sexual orientation, religious or other similar beliefs, and physical or mental health, including disability-related information	Consent
Processing medical history/health-related data to make reasonable adjustments during the recruitment process	Medical history/physical or mental health-related data	Compliance with our legal obligations
Processing health-related data to when we need to use or offer occupational health to Candidates in the context of certain types of roles (e.g. teaching, nursing or night work)	Medical history/physical or mental health-related data	Compliance with our legal obligations
Processing criminal convictions data when carrying out background checks	Details of any criminal convictions disclosed by the Candidate or obtained via a DBS (Disclosure and Barring Service) check	Consent

Processing certain types of Candidate data in order to calculate entitlement to annual leave	Medical history/health-related data Religious affiliation	Legitimate interests
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Where we are relying on your consent for such processing, you have the right to withdraw your consent at any time by contacting our Data Protection Representative.

To help us to establish, exercise or defend legal claims. In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

**b. Client Data:**

The main way we use your data is to provide our recruitment services to you, to market and advertise our services, and to make or defend legal claims. We use your data to ensure that the contractual arrangements between us can be efficiently run and adhered to and to ensure we maintain a strong working relationship. The more information we have about you/from you, the more we can tailor our service. The 3 main ways in which we use your data is as follows:

Recruitment Activities:

We store your personal data and/or the personal data of individual contacts at your organisation as well as keeping records of our conversations, meetings, registered jobs and placements on our database. This processing is carried out under the legal basis of legitimate interests.

From time to time we may undertake customer satisfaction surveys, and we may also process your data to enable us to send you targeted, relevant marketing materials or other communications which we think are likely to be of interest to you. We rely on the basis of legitimate interests for this processing.

To provide professional references on any previously employed candidate. We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests.

Marketing Activities

We will not, as a matter of course, seek your consent when sending marketing materials to a corporate postal or email address. Instead we rely on the basis of legitimate interests for the purposes of marketing activities.

To help us to establish, exercise or defend legal claims. In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

**c. Supplier Data:**

We only use your information to:

Store (and update when necessary) your details on our database, so that we can contact you in relation to our agreements;

Offer services to you or to obtain support and services from you;

Perform certain legal obligations; and

Help us to target appropriate marketing campaigns.

For all of the above, we rely on the basis of legitimate interests for such processing.

In more unusual circumstances, we may process your personal data to help us to establish, exercise or defend legal claims.

#### **d. Additional Contacts:**

We will only use the information that our Candidate or prospective employees gives us about you for the following purposes:

If our Candidates or employees states your contact details as they are providing you as an emergency contact, we'll contact you in the case of an accident or emergency affecting them; or

If you were stated by our Candidate or a prospective employee as a referee, we will contact you in order to obtain this reference. This is part of our Candidate compliance process and may support them in securing a new role.

If you were put down by our Candidate or a prospective employee as a referee, we may sometimes use your details to contact you in relation to recruitment activities that we think may be of interest to you, in which case we will use your data for the same purposes for which we use the data of Clients.

We rely on the basis of legitimate interests for processing your personal data for all of the above reasons.

#### **e. Website Users:**

We use your data to help us to improve your experience of using our website, for example by analysing your recent job search criteria to help us to present jobs or Candidates to you that we think you'll be interested in. We rely on the basis of legitimate interests when we are processing your personal data for these reasons. If you would like to find out more about cookies, including how we use them and what choices are available to you, please see our Cookie Policy.

### **7. Who do we share your personal data with?**

We may share your personal data with suppliers and service providers. Examples include:

- Individuals and organisations who hold information related to your reference or application to work with us, such as current, past or prospective employers, educators and examining bodies;
- Tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this data;
- Service providers who perform functions on our behalf, including external consultants, business associates and professional advisers such as lawyers, auditors and accountants, administration and technical support functions;
- Third party providers of IT, software, cloud and/or document storage services, where we have an appropriate processing agreement or similar protections in place;
- Marketing technology platforms and suppliers; and
- If WE Talent merges with or is acquired by another business or company in the future, (or is in meaningful discussions about such a possibility) we may share your personal data with the (prospective) new owners of the business or company.

There are also additional partners with whom we may share your personal data with depending on your type of service user.

#### **a. Candidate Data:**

We may share your personal data with the following categories of people:

- potential employers and other recruitment agencies/organisations to increase your chances of finding employment;
- third party partners, job boards, job platforms, job aggregators, software providers and cloud-based databases where we consider this will improve the chances of finding you the right job or improving recruitment processes more generally;
- MSP suppliers as part of our Clients' MSP programmes;

- your former employer(s) in order to seek a reference for you
- third parties who we have retained to provide services such as reference, qualification and criminal convictions checks and right to work verification;
- academic and/or professional institutions to check that you hold any required qualifications or memberships
- internal and external auditors of our Clients when we are required to share this data with them upon request in order to comply with our contractual or regulatory obligations; and
- third parties helping us by developing services and processes to optimise the Candidate selection process in order to improve the quality and efficiency of recruitment services.
- If you are a temporary worker, we will share your personal data with: (1) external suppliers (of services and/or technology) who provide payroll and/or billing services to us; and (2) other supply chain intermediaries such as an umbrella company.
- If you are a temporary worker, we may in certain circumstances share your personal data with medical professionals such as your GP or an occupational health specialist.

#### **b. Client Data:**

We will share your data mainly for the purpose of introducing Candidates to you and to monitor and manage any temporary workers we are supplying to you. We may share your information with associated third parties such as our service providers to help us meet these aims.

#### **c. Supplier Data:**

We may share your information with associated third parties such as our service providers and organisations to whom we provide services.

#### **d. Additional Contacts:**

We may share your information associated third parties such as our service providers and organisations to whom we provide services.

If you are a referee of one of our Candidates, we may also share your personal data with the following categories of people:

- third parties who we have retained to provide services such as reference, qualification and criminal convictions checks, to the extent that these checks are appropriate and in accordance with local laws; and
- internal and external auditors of our Clients when we are required to share this data with them upon request in order to comply with our contractual or regulatory obligations.

#### **e. Website Users:**

We may share your information with providers of web analytics services, marketing automation platforms and social media services to make sure any advertising you receive is targeted to you.

We require all third parties to respect the security of personal data and to treat it in accordance with the law. We do not allow third-party service providers with whom we may work to use your personal data for their own purposes and we only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **8. How do we safeguard your personal data?**

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures. These include measures to deal with any suspected data breach.

If you suspect any misuse or loss of or unauthorised access to your personal information please let us know immediately by contacting our Data Protection Representative at [hello@we-talent.co.uk](mailto:hello@we-talent.co.uk).

Retention of your data: We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## 9. Your Legal Rights

You have a number of rights in respect of your personal data. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Under certain circumstances, by law you have the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). You may ask us to confirm what information we hold about you at any time, and request us to modify, update or delete such information.
- **Request correction** of the personal data that we hold about you if it is inaccurate or incomplete. If we receive such a request we will make the necessary changes and updates. If we have shared your personal data with third parties, we will notify them about the correction unless this is impossible or involves disproportionate effort. Where appropriate, we may also tell you which third parties we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.
- **Request erasure** of your personal data. You have the right to request that we erase your personal data in certain circumstances. Please note this is not an absolute right and we may refuse to delete your personal data. We will usually agree to delete personal data which meet one of the following criteria: (1) we no longer need to process your personal data; (2) where we have relied on your consent as the legal basis for processing your personal data, and you have withdrawn your consent to us processing your data, and there is no other valid legal basis for us to continue processing; (3) where we have relied on legitimate interests as the legal basis for processing, and you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing; (4) if the personal data has been processed unlawfully (i.e. in a manner which does not comply with the UK GDPR); (5) it is necessary for the personal data to be erased in order for us to comply with our legal obligations as a data controller. When complying with a valid request for data erasure we will take all reasonably practicable steps to delete the relevant data.
- **Object to processing.** This right enables you to object to us processing your personal data where we do so for one of the following four reasons: (i) our legitimate interests; (ii) to enable us to perform a task in the public interest or exercise official authority; (iii) to send you direct marketing materials; and (iv) for scientific, historical, research, or statistical purposes. The “legitimate interests” and “direct marketing” categories above are the ones most likely to apply to our Website Users, Candidates, Clients and Suppliers. If your objection relates to us processing your personal data on the basis of legitimate interests, we must act on your objection by ceasing the activity in question unless: (1) we can show that we have compelling legitimate grounds for processing which overrides your interests; or (2) we are processing your data for the establishment, exercise or defence of a legal claim. If your objection relates to direct marketing, we must act on your objection by ceasing this activity. To stop receiving marketing or to change your marketing preferences please contact our Data Processing Representative.
- **Request the restriction of processing** of your personal data. This means that we can only continue to store your data and will not be able to carry out any further processing activities with it until either: (i) one of the circumstances listed below is resolved; (ii) you consent; or (iii) further processing is necessary for either the establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of public interest. The circumstances in which you are entitled to request that we restrict the processing of your personal data are: (1) where you dispute the accuracy of the personal data that we are processing about you. In this case, our processing of your personal data will be restricted for the period

during which the accuracy of the data is verified; (2) where you object to our processing of your personal data for our legitimate interests. Here, you can request that the data be restricted while we verify our grounds for processing your personal data; (3) where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it; and (4) where we have no further need to process your personal data but require the data to establish, exercise, or defend legal claims. If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will notify you before lifting any restriction on processing your personal data.

- **Request the transfer of your personal information to another party.** If you wish, you have the right to transfer your personal data between data controllers. In effect, this means that you are able to transfer your WE Talent account details to another party. This right of data portability applies to: (i) personal data that we process automatically (i.e. without any human intervention); (ii) personal data provided by you; and (iii) personal data that we process based on your consent or in order to fulfil a contract.
- **Right to complain:** You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so we encourage you to contact us in the first instance.

Please note, you will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. If you request further copies of this information from us, we may charge you a reasonable administrative cost where legally permissible. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

To get in touch about the rights of access, correction, erasure or restriction please get in touch with our Data Protection Representative. We will deal with your request without undue delay, and in any event within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

## 10. International transfers of personal data

Your data may be transferred:

- to third parties (such as advisers or other Suppliers to WE Talent);
- to overseas Clients;
- to Clients within your country who may, in turn, transfer your data internationally;
- to a cloud-based technology or storage provider; and
- to other third parties (see section on "Who do we share your personal data with" for more information).

We want to make sure that your data is stored and transferred in a way which is secure. We will therefore only transfer data outside of the United Kingdom where the transfer complies with the UK GDPR. Below are the transfer mechanisms allowed under the UK GDPR.

**Adequacy regulation.** We may transfer your personal data to any third party who is located in a country which holds a current adequacy regulation from the UK data protection commissioner. This includes transfers to certain companies based in the US, if the company receiving your personal data has signed up to the UK Extension to the EU-US Data Privacy Framework.

**Appropriate safeguards.** We may transfer your personal data to a third party who is based in a country without an adequacy regulation if we can ensure that your personal data is adequately protected and you have suitable rights and freedoms in relation to your personal data. There are a number of ways in which we can put these safeguards in place; however WE Talent will normally make use of the UK's standard data protection clauses to ensure that the receiver agrees, in a binding contract, to ensure an equivalent level of protection as the UK GDPR.

**Exception.** If we cannot make the transfer under the first 2 options we will consider an exception. We will not routinely make transfers of your personal data using an exception. The UK GDPR allows for a number of exception options; however WE Talent will normally use one of the following: (1) your explicit consent; or (2) to make or defend a legal claim.

## **11. Automated Decision Making or Profiling**

We do not undertake automated decision making or profiling. We do use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision-making process.

## **12. Complaints, queries or more information**

We try to meet the highest standards when processing personal data and we take any complaints we receive very seriously. If you wish to exercise any your data subject rights, request more information, or make a complaint about how we have handled your personal data, this Privacy Policy or any of the procedures set out in it, please contact our Data Protection Representative at [hello@we-talent.co.uk](mailto:hello@we-talent.co.uk).

You may also make a complaint directly to the ICO ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so we encourage you to contact us in the first instance.

This Privacy Policy was last updated in March 2026.