

DeLux Fund Recruitment Privacy Policy
(updated 6th June 2018)

At DeLux Fund Recruitment, we have always taken the privacy and confidentiality of your personal data into deep consideration. In order to be compliant with the new European GDPR regulation, we have updated our Privacy Policy as the protection and the privacy of our candidates, clients and users is very important to us.

This Privacy Policy describes how DeLux Fund Recruitment will collect and use your personal information when you register with us via our website, apply for a job via our website, or when we receive your CV through another source such as a job board or through social media.

This website is only intended for those over 18 years of age. Data will only be collected for the aforementioned.

1. How we collect information

1.1 Visiting our website

You can visit our website without disclosing your personal information. Most of the pages on our website are available to view without registration. You can search for job vacancies and read content without registering any personal data. We collect a limited amount of information from our website users, such as country location, which we use to help us improve your experience with our website and manage our services accordingly.

1.2 Registration via our website:

When you register as a candidate on our website, we may ask for certain personal information including your name and contact information (email, address and telephone number). When you send us your CV, depending on the nature of your request, we may also ask for your job search criteria and preferences, employment history and salary expectations.

You can request that you receive job alerts direct to your email through the website by completing your job search criteria and preferences. You can stop receiving these job alerts at any time by clicking the unsubscribe link contained in the job alert email.

1.3 Collecting data from another platform

We may obtain your personal information from various sources, including when you apply for a job via a Job Board such as Monster, directly through our website, from Social Media sites such as LinkedIn etc. When you agree that one of these platforms release your personal data, we can collect and use it.

2. What information is collected

When you register as a candidate with DeLux Fund Recruitment, we will collect your personal information directly from you, your CV, or any referees which you provide. Our Clients may request additional personal information about you in relation to their job vacancies and requirements. The personal information DeLux Fund Recruitment may collect include:

- Your Identity and personal information (full name, gender, date of birth and marital status);

- Evidence of your right to work in Europe which may include identification, work permit, place of birth, driving license, etc (in accordance with legal requirements);
- Contact details including your email, address and phone numbers;
- Payroll information such as: your matricule number, address, level of seniority, marital status, date of birth, previous payslip.
- Your job search criteria, preferences and expectations;
- Education and training qualifications, skills, experience;
- Current salary and additional benefits;
- Previous employment history;
- Contact details of employment and/or educational referees. References will also be stored.
- Any additional information contained in your CV or that you choose to provide to us;

3. How we use your personal information

We will only use your personal information when the law allows us to and will use your personal information in the following circumstances:

- To fulfil a contract we are about to enter into or have entered into with you;
- Where it is in our legitimate interests;
- When it is our legal or regulatory duty;
- When you consent.

A legitimate interest is when we have a business or commercial reason to use your information in conducting and managing our business. We will consider and balance any potential impact on you and your legal rights when we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required for compliance with a legal or regulatory obligation or permitted to by law).

Therefore, we use, process, store and disclose your personal information and other data we collect to provide you with recruitment services including sending you job alerts via email, permanent and fixed term contract placements in finance, accounting, administrative, legal, compliance and other related roles, employment opportunities and career-related information.

DeLux Fund Recruitment will never disclose your personal information to any of our clients without full approval of the candidate.

3.1 Change of Purpose

We will only use your personal information for the purposes for which we collected it (i.e. the provision of recruitment services if you are a candidate or job applicant), unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We may not process your personal information without your knowledge or consent, in compliance with the above rules, except where this is required or permitted by law.

5. Disclosing your Personal Information to 3rd Parties

DeLux Fund Recruitment will never disclose the personal information to one of our clients without the full consent of the candidate.

To the extent necessary or appropriate and without notifying you, Delux Fund Recruitment may disclose your Personal Information (name, forename, skills) to external 3rd Parties in the following circumstances:

- to government agencies including: Police and other law enforcement agencies; regulatory and supervisory authorities; credit reference agencies and 3rd parties performing sanctions and terrorism checks.
- to comply with applicable laws, the service of legal process, or if we reasonably believe that such action is necessary to: (a) comply with the law requiring such disclosure; (b) protect the rights or property of Delux Fund Recruitment; (c) prevent a crime, protect national security or for fraud detection or prevention; or (d) protect the personal safety of individuals using our website or members of the public.
- to 3rd parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, we will let you know.
- to IT consultants carrying out testing and development work on our IT systems, service providers who we may appoint as data processors and to other service providers who may be based outside the EEA.

5.1 Security of your Personal Information

We have put in place appropriate security measures to prevent your personal information from being lost, used or accessed in an unauthorised way, altered or disclosed.

6. How long we Retain your Personal Information

Delux Fund Recruitment will retain your Personal Information for as long as necessary to fulfil the purposes that it was collected for. Therefore we will keep your personal information throughout the period of your relationship with us and whilst we are providing you with recruitment/employment services.

The maximum term for storage of data is two years without any contact. At the end of this period, you will be contacted again to decide whether you want to continue to be registered at our offices. The purpose of storing your CV for this period is for us to match it with other job opportunities which may arise in the future and could fit with your long-term career objectives.

In some circumstances we may anonymise your personal information (so that it can no longer be associated with you and you cannot be identified). We do this for research or statistical purposes in which case we may use this anonymised data indefinitely without further policy to you.

7. Your Legal Rights

7.1 Right to access your personal information at any time. This enables you to receive a copy of the data we hold about you and to check that we are lawfully processing it.

7.2 Right to rectification: request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate data rectified, although we may need to verify the accuracy of the new data you provide to us.

7.3 Right to erasure: request of deletion or removal of your personal information and all data. This enables you to ask us to delete or remove your data where we do not have a valid reason to continue to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Please Note: we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

7.4 Object to processing of your personal information where we are relying on a legitimate interest (or those of a 3rd party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Information for **direct marketing** purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

7.5 Request restriction of processing of your personal information. This enables you to ask us to suspend the processing of your personal information in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to process it.

7.6 Right to Data Portability: request the transfer of your personal information to you or to a 3rd party. We will assist you with this transfer to a 3rd party either by transferring your personal information for you or by providing you with a copy in a machine-readable format. Please Note: this right only applies to automated information which you initially provided consent for us to use or where we used the Personal Information to perform a contract with you.

7.7 Withdraw consent at any time where we are relying on your consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

We want to ensure we keep your personal information accurate and up to date. In addition to your legal rights, you may ask us to make changes or request a copy of your personal information informally, by contacting your local DeLux Fund Recruitment office.

8. Contact Information

DeLux Fund Recruitment will always try to respond to all legitimate requests within a reasonable time frame.

If you continue working with DeLux Fund Recruitment after 25th May 2018, we assume you agree to these updates. If you do not agree with this updated privacy policy, please contact us directly and we will delete your data or answer any questions you may have.

Please contact our office directly at DeLux Fund Recruitment, 2A rue des Capucins, L-1313 Luxembourg or email gdpr@deluxfundrecruitment.com

8.1 Changes to this Privacy Policy

If we change this Privacy Policy we will post any updates here for your review. If we change material terms we will provide policy of the revised Privacy Policy for 30 days on our home page at <https://deluxfundrecruitment.com/> with a link back to this page.

8.2 Contact Details

If you have any questions about how we use your Personal Information, contact us at: gdpr@deluxfundrecruitment.com.