

# Privacy and Cookie Policy

## MPower Plus Policy: March 2021 edition v1.3

MPower Plus UK Limited (MPower Plus Recruitment) provide recruitment solutions, career counselling, leadership development and international placement services to fulfil both local and global needs.

This privacy policy governs the collection and use of personal information by MPower Plus Recruitment. For more information about MPower Plus Recruitment please see: <http://mpower-plus.co/>.

This website is owned and run by MPower Plus Recruitment.

We are committed to protecting and respecting your privacy. This privacy policy explains the types of personal information we collect, how we use that information, who we share it with, how we protect that information, and your legal rights in relation to your information. We are committed to abiding by this privacy policy, as well as the requirements of applicable laws, in the operation of our business. Please read this policy carefully as it explains our views and practices regarding your personal information and how it is handled. By accessing or browsing our websites, you confirm that you have read, understood and agree to this privacy policy in its entirety. If you do not agree with the practices described in this policy, you should not use this website.

## Who we are

For the purpose of applicable data protection laws, the data controller is MPower Plus Recruitment, 6th Floor, Two Kingdom Street, London W2 6BD. Our Data Privacy officer is contactable via email [privacyofficer@mpower-plus.co](mailto:privacyofficer@mpower-plus.co)

## Information covered by this policy

This policy covers all personal information collected and used by MPower Plus Recruitment. In this policy "personal information" means information that (either in isolation or in combination with other information held by us) enables you to be identified as an individual or recognised directly or indirectly. This may include your name, date of birth, sex, postal address, email address, computer IP address, phone number, credit card number, bank account details, login information and technical information from the devices you use to receive our services.

## Collection of personal information

We may collect information about you from different sources detailed below.

## Information you give us:

When you access and browse our websites (including when you register or fill in forms on our websites) and when you correspond with us by phone or email or other electronic means, you may give us information about yourself.

**CANDIDATE DATA:** In order to provide the best possible employment opportunities that are tailored to you, we need to process certain information about you. We only ask for details that will genuinely help us to help you, such as your name, age, contact details, education details, information about your employment (including your job title, responsibilities and employer's details), emergency contacts, immigration status, financial information (where we need to carry out financial background checks), and social security number (and other relevant information you may choose to share with us). Where appropriate and in accordance with local laws and requirements, we may also collect information related to your health, diversity information or details of any criminal convictions.

## Information we collect about you:

With regard to each of your visits to our website(s), we may also use cookies and other technologies to automatically collect the following information:

Technical information, including the Internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating systems and platform; and

Information about your visit, including the full Uniform Resource Locators (URL) clickstreams to, on and from our websites, products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs), methods used to browse away from the page and any phone number used to call us.

## Information we receive and collect from other sources:

We may receive information about you from other websites operated by MPower Plus Recruitment or from the other industry job boards that you may have posted your details to that are either in the public domain or as part of a licensed service. We also work closely with third parties such as payment processors and payroll service providers and may receive information about you from them. We may also collect information about you from publicly available sources, including publicly available content on social media.

## Who do we share your personal data with?

**CANDIDATE DATA:** We may share your personal data with various parties, in various ways and for various reasons. Primarily we will share your information with prospective employers to increase your chances of securing the job you want. Unless you specify otherwise, we may

also share your information with any of our group companies and associated third parties such as our service providers where we feel this will help us to provide you with the best possible service.

### How long do we keep your personal data for?

If we have not had meaningful contact with you (or, where appropriate, the company you are working for or with) for a period of five (5) years, we will delete your personal data from our systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation).

While we will endeavour to permanently erase your personal data once it reaches the end of its retention period or where we receive a valid request from you to do so, some of your data may still exist within our systems, for example if it is waiting to be overwritten. For our purposes, this data has been put beyond use, meaning that, while it still exists on an archive system, this cannot be readily accessed by any of our operational systems, processes or Staff.

## Cookies

We use cookies and similar technologies on our web sites to improve performance and make your experience better.

Your use of our web sites indicates your consent to the cookies described in this policy. Please see HOW YOU CAN CONTROL COOKIES, below, for more information on how to withdraw your consent at any time.

### WHAT ARE COOKIES?

A web cookie, a commonly used data collection technology, is simply a piece of text which can be placed on the browser of your personal computer or mobile device and subsequently read as you visit a web site. A cookie may be a session cookie, that is, a cookie that remains on your browser while you are logged on to a particular web site and then disappears when you close your browser, or it may be a persistent cookie, a cookie that remains on your browser over a period of time. Information from a cookie may be collected and used in aggregate form or data may be collected into an individual profile or record. That individual record may either be unique but anonymous, or the profile can be linked with information that identifies you as an individual.

You can learn more about cookies, generally, at [www.allaboutcookies.org](http://www.allaboutcookies.org)

## HOW DO WE USE COOKIES?

We may use cookies for a number of purposes:

### 1. Essential cookies & Performance cookies

We allow third parties (Google Analytics) to set analytics, or performance, cookies to collect and report aggregate information. These cookies provide reporting to us on an aggregate basis and so, do not identify you at all. We use the aggregate reports to understand how our web sites are used and improve their usefulness to our audiences.

A number of cookies also support how our web sites function, identifying your pc or end device on a unique but anonymous basis. These cookies may, for example, remember your language preferences or recognize an individual's activity within a single session.

We may conduct analyses of user traffic to measure the use of our sites and to improve the content of our web sites and our services. These analyses will be performed through the use of IP addresses and cookies.

## THIRD PARTY COOKIES AND ADVERTISING ON OUR SITES

We do not use third party cookies or allow advertisers to show you advertising on our sites.

## HOW YOU CAN CONTROL COOKIES

The cookies we use or allow are an accepted part of ecommerce and important to your use of our web sites. Performance cookies allow us to understand our audiences as a whole and improve how our sites meet your needs and expectations.

### 1. Browser controls

Most modern browsers offer you ways to control or block cookies. These browser controls will usually be found in the "options" or "preferences" menu. For more help, you may take a look at the "Help" settings or review these website for more details –

<http://www.aboutcookies.org/Default.aspx?page=1>

## THIS PRIVACY POLICY

If our use of cookies changes, we will post the changes to this policy. Please check frequently as online data collection practices and our use of them continue to evolve. To contact us about this policy, you may email [privacyofficer@mpower-plus.co](mailto:privacyofficer@mpower-plus.co). When emailing please indicate which of our sites you question relates to.

## Our use of your personal information

We may use your personal information to:	How do we use personal information for this purpose?	What is the legal basis for us processing your information in this way?
Provide you with goods and services	We will need to use your personal information where this is necessary for us to perform our obligations under a contract with you, for example where we place you forwards to a client as a candidate, place you in full time employment or engage you on a contract with a client, and to ensure your requirements are met.	Using your personal information in this way is necessary for us to perform our contractual obligations to you.
Ensure that your requirements are met whilst interacting with our recruiters and online systems	We may use your personal information to better understand your requirements and preferences, so that we can provide you with a tailored experience.	It is in our legitimate interests to look at your requirements so that we can personalise our services for you, to better meet your needs as a customer or candidate.
Process your payments and protect against fraudulent transactions	We may need to process your personal information in order to keep your payments safe and secure and protect against fraudulent transactions.	It is in our legitimate interests to process personal information to keep our customers' payments secure.
Contact you for research purposes or to tell you about our special offers or other goods and services	We will need to use your personal information (such as your email address and/or telephone number) to send you information about services that you may be interested in or	It is in our legitimate interests to process your information in this way. You will always have the option to unsubscribe at any time.

We may use your personal information to:	How do we use personal information for this purpose?	What is the legal basis for us processing your information in this way?
	opportunities for Candidates. Please note that we may also share your personal information with other entities in the MPower Plus Recruitment group of companies for this purpose.	
Analyse user traffic to measure use of our websites and to improve the content of our websites and our services	We may sometimes use your personal information (e.g. your IP address) to measure use of our websites and assess the effectiveness of our site pages, including advertising on our sites. We may also use this personal information to improve the content of our websites and services.	It is in our legitimate interest to look at user traffic so that we can improve our websites and better meet your needs as a customer.
Comply with legal requirements and exercise or defend legal claims	We may sometimes need to process personal information to comply with legal requirements to which we are subject (for example, in relation to health and safety and the processing of Payroll, reporting to Tax authorities etc).	It is in our legitimate interests and the Performance of a contract to process personal data for the purposes of complying with legal requirements to which we are subject.

## Transfers of personal information

We may share your personal information with any member of the MPower Plus group of companies, including subsidiaries and holding companies, in order to enable you to access the services, provide you with customer support and conduct the other activities described

in this privacy policy. Such group companies may be located outside the European Economic Area ("EEA"), in which case the section "Where we store your data" below will apply.

We use other companies, agents or contractors ("Service Providers") to perform services on our behalf or to assist us with the provision of services to you. For example, we may engage Service Providers to provide market research, marketing (including competitions), advertising, communications, training, IT, hosting and other infrastructure, payment processing, and data cleansing and processing services. In the course of providing such services, these Service Providers may have access to your personal information. These third parties are contractually bound only to use personal information to perform the services that we hire them to provide. We will always use our best efforts to ensure that all the Service Providers we work with will keep your personal data secure.

We may also 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 prospective seller or buyer of such business or assets;

If any member of the MPower Plus Recruitment or substantially all of its assets are acquired by a third party, in which case personal data about its customers will be one of the transferred assets; and

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 our terms and conditions or other agreements, or to protect the rights, property or safety of the MPower Plus Recruitment.

Unsubscribing with MPower Plus UK Ltd will stop [MPower Plus Recruitment] from contacting you in the future, but not the individual third parties whom you have interacted with independently.

## Where we store your data

The data that we collect from you may be transferred to, and stored at, a destination outside the EEA. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the provision of services to you or the processing of your payment details. We will take all steps that are mandatory or reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy and applicable data protection laws, including, where relevant, entering into EU standard contractual clauses (or equivalent measures) with the party outside the EEA receiving the data.

## Security of personal information

We use administrative, technical, and physical measures to safeguard personal information against loss, theft and unauthorised uses, access or modifications.

Certain areas of our websites may be password protected. Where we have given you (or where you have chosen) a password, you are responsible for keeping this password confidential. We ask you not to share your password(s) with anyone.

## Third party websites and apps

Our websites may contain links to and from third party websites and we may provide you with details of apps provided by third parties. Please note that if you follow a link to any of these websites or download an app, these websites and apps will have their own terms of use and privacy policies and that we do not accept any responsibility of liability for these policies. Please check these policies before you submit any personal data to these websites or apps.

## Your rights

You have the following rights with respect to the personal information that we hold about you:

### Your right to access the information we hold about you

You have the right to ask us whether or not we process your personal data and to request information on the purposes of data processing as well as confirmation on whether we use your personal information for these purposes only.

You can request access to the information we hold about you by contacting us using the contact details set out below. We will endeavour to make our file of your information available to you within 1 month, although occasionally we may not be able to give you access to the personal information we hold about you (for example, we may not be able to give you access if it would unreasonably affect someone else's privacy or if giving you access poses a serious threat to someone's life, health or safety).

You also have the right to be informed of the third parties to which we transfer your personal data within the scope of this privacy policy.

### Your right to have your information corrected

You have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify

them about the rectification unless this is impossible or involves disproportionate effort. Where appropriate, we will 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.

## Your right to have your information deleted

You have the right to request that we erase your personal data in certain circumstances. Normally, the information must meet one of the following criteria:

- the data is no longer necessary for the purpose for which we originally collected and/or processed;
- where previously given, you have withdrawn your consent to us processing your data, and there is no other valid reason for us to continue processing;
- the data has been processed unlawfully (i.e. in a manner which does not comply with the GDPR);
- it is necessary for the data to be erased in order for us to comply with our legal obligations as a data controller; or
- if we process the data because we believe it necessary to do so for our legitimate interests, you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.

## Your right to object to us processing your data

You have the right to ask us to stop processing your data, even where that processing is necessary for our legitimate interests (for example, where the processing is necessary for the legitimate commercial objectives we pursue in the course of our business), including the profiling we undertake to send you personalised offers, product recommendations and similar content. You also have the right to object to any results of a processing activity that prejudice your rights and that are conducted exclusively through automated systems.

You also have the right to ask us to stop processing your data for direct marketing purposes, including any profiling we undertake for the purposes of direct marketing. We will in any case only send you marketing communications if you have previously agreed to this, but if you change your mind you can easily unsubscribe from our marketing communications at any time by following the instructions included in these marketing communications.

Please note that, if you have consented to receive offers from our partners, our partners are responsible for taking account of your rights, including your right to opt-out of receiving offers from them. You may, however, at any time opt-out of receiving offers from third

parties by logging in to your user account and changing the settings. If you had previously opted in, your personal data will cease to be transmitted to our partners from the time your request is processed.

## Your right to have your data transmitted to another organisation

Where we hold personal information about you with your consent or for the performance of a contract with you, you also have the right to ask us to provide you with the personal information we hold about you in a structured, commonly used and machine-readable format and, where technically feasible, to transmit that data to another organisation.

## Making a complaint

You have the right to lodge a complaint with the data [protection authorities](#) if you believe that we have not complied with applicable data protection laws. You also have a right to claim damages if processing of your personal information violates applicable data protection law.

## Changes to our privacy policy

We reserve the right to amend this privacy policy at our sole discretion, without prior notice to you. We will notify you of any such changes (including when they will take effect). Your continued use of our services or our websites following the posting of changes to these terms means that you consent to those changes.

## Contacting us

If you have any questions about this privacy policy, you can email us at [privacyofficer@mpower-plus.co](mailto:privacyofficer@mpower-plus.co) [If you wish to exercise your rights under applicable data protection law and this privacy policy, please contact us in writing at:

The Data Protection Officer, MPower Plus Recruitment, 6th Floor, Two Kingdom Street, London W2 6BD.

Version 1 of this privacy policy is effective as of 31 May 2018.