



Privacy Policy

Invicta Recruitment Ltd (a Company incorporated in England and Wales having its registered office at Fairview, 192 Park Road, Peterborough, PE1 2UF), care about your privacy and are committed to processing your personal information in accordance with fair information practices and applicable data privacy laws.

Scope

This notice explains how Invicta Recruitment handles the personal information of all data subjects such as employees, applicants, interims, former employees, dependents, beneficiaries, contractors, consultants, and temporary agency workers during its activities. We may amend this notice from time to time, should it become necessary to do so.

Collection and Use of Personal Information

We will process your personal information to administer our employment or contractual relationship with you and to run our businesses. We may collect, use and transfer your personal information through automated and/or paper-based data processing systems. We have established routine processing functions (such as processing for regular payroll and benefits administration). We also process personal information on an occasional or *ad hoc* basis (such as when an employee or worker is being considered for a particular new position or in the context of changes to marital status for example).

In the normal course of our activities, we can collect the following types of personal information:

- Personal identification information, such as your name, home address, date of birth, gender, work-related photographs, and home phone number;
- Government-issued identification numbers, such as national ID for payroll purposes;
- Immigration, right-to-work and residence status;
- Family and emergency contact details;
- Job-related information, such as years of service, work location, employment ID, work record, and contract data.
- Educational and training information, such as your educational awards, certificates and licenses, vocational records and in-house training attendance;
- Recruitment and performance-related data, such as objectives, ratings, comments, feedback results, career history, work equipment, career and succession planning, skills and competencies and other work-related qualifications;
- CCTV footage and other information obtained through electronic means such as swipe card or app records
- Information related to your usage of Invicta Recruitment Ltd assets;
- Information needed for compliance and risk management, such as disciplinary records, background check reports and security data; and
- Payroll and payment or benefits-related information, such as salary and insurance information, dependents, government identifier or tax numbers, bank account details, and employment related benefits information.



We process personal information for the following purposes:

- (1) workforce planning, recruitment and staffing;
- (2) workforce administration, payroll, compensation and benefit programs;
- (3) performance management, learning and development;
- (4) advancement and succession planning;
- (5) legal compliance, including compliance with government authority requests for information, liens, garnishments and tax compliance;
- (6) workplace management, such as health and safety programmes,
- (7) internal reporting,
- (8) audit;
- (9) to protect Invicta Recruitment, its workforce, and the public against injury, theft, legal liability, fraud or abuse; and
- (10) other legal and customary business-related purposes.

In addition, we may process sensitive personal information if it is needed for legitimate business objectives or if it is required to comply with applicable law. Sensitive personal information will not be collected, processed or transferred, except where adequate privacy protection mechanisms are in place and after having first obtained your informed consent, if required by law.

Your personal information may be passed to the client and vice versa if you have given consent for us to do so. Such data may include confirmation of your performance on a specific assignment, which the client may provide to us so that we can ensure you are performing at the required standards. Information will only be shared to ensure we can administer our employment or contractual relationship with you. We will not pass any personal data that is not necessary to fulfil our obligations to you and the client.

We may obtain information about you from searching for potential candidates from third party sources such as job sites. If you 'like' our page on Facebook we will receive your personal information from the site.

Disclosures

We may disclose your personal information for our legitimate purposes or a 3rd parties legitimate interests, for the continuity of our business/ service, in the following circumstances:

- Other Invicta Recruitment entities, joint ventures, subcontractors, vendors or suppliers who perform services on our behalf for the aforementioned purposes; or
- A newly formed or acquiring organisation if Invicta Recruitment is involved in a merger, sale or a transfer of some or all of its business;

We may also disclose your details to any recipient:

- if we are legally obliged to, such as by applicable court order or law;
- with your consent, such as for employment verification or bank loans; or
- when reasonably necessary such as in the event of a life-threatening emergency.



Choice

We respect your right to object to any uses or disclosures of your personal information that are not:

- (i) required by law,
- (ii) necessary for the fulfilment of a contractual obligation (e.g., employment contract), or
- (iii) required to meet the legitimate interests of Invicta Recruitment as an employer (such as disclosures for internal auditing and reporting purposes or other processing covered by this notice). If you do object, we will work with you to find a reasonable accommodation.

Automatic Processing

We do not use automatic processing at Invicta Recruitment.

International Transfers

Your personal information may be transferred outside of the country where you work, including to countries that do not provide the same level of protection for your personal information. Invicta Recruitment is committed to protecting the privacy and confidentiality of personal information when it is transferred. Where such transfers occur, we will assure that adequate protection exists either through appropriate contractual arrangements or as required by law.

Accuracy

We take reasonable steps to ensure that personal information is accurate, complete, and current. Please note that you have shared responsibility with regard to the accuracy of your personal information. Please notify us through your local site contact of any changes to your personal information or that of your beneficiaries or dependents.

Access

You may reasonably access and update the personal information pertaining to you that is on file with Invicta Recruitment. You can exercise this right by contacting Irena Sereickiene on: irena@invictarecruitment.com

- Your ability to access and correct personal information is not limited by transfers of personal information – the ability shall exist regardless of where personal information is physically situated within Invicta Recruitment.
- Your right to access your personal information may have some restrictions. For example, access may be denied (i) in the case of recurrent access requests within a short time interval, or (ii) where providing such access or correction could compromise the privacy of another person or unreasonably expose sensitive company information.



Right to Erasure

You can ask us to delete any information we hold about you if the law and our data retention policies no longer require us to hold it.

Security

Invicta Recruitment takes precautions to protect personal information from loss, misuse, and unauthorised access, disclosure, alteration, and destruction. We have taken appropriate technical and organisational measures to protect the information systems on which your personal information is stored and we require our suppliers and service providers to protect your personal information by contractual means.

Retention

Your personal information will be retained as long as necessary to achieve the purpose for which it was collected, usually for the duration of any contractual relationship and for any period thereafter as legally required or permitted by applicable law.

Handling Privacy Concerns

If you have any questions about this notice or if you believe that your personal information is not handled in accordance with the applicable law or this notice, please contact Irena Sereickiene in the first instance: irena@invictarecruitment.com