



At ITARMI, your privacy is important to us. We want to make our position transparent and your rights easily understood by you. This Privacy Policy explains what personal data we collect, how we use it and your ability to make choices about this.

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## CONTACT US ABOUT THIS POLICY

If you would like to contact us about this Privacy Policy, you can do so by sending us an e-mail at: **dataprotection@itarmi.com**. This e-mail address also applies wherever we say “contact us” in this Privacy Policy. Please only use this e-mail address, rather than any other e-mail address you may have for any individual or team at ITARMI.



## IMPORTANT DEFINITIONS IN THIS POLICY

**You** means a current or potential Engineer (whether acting directly or through a personal service company) or a Customer contact.

**We** or **us** means ITARMI.

**Customer** means any organisation to which we market, offer or provide Services or any organisation with whom we may collaborate in providing Services to third parties (including, for example, managed service providers, resourcing resellers, outsourcing companies and umbrella companies).

**Customer contact** means an individual who is generally authorised to negotiate, communicate or transact on behalf of a current or potential Customer and with whom we communicate, in particular in relation to Services.

**Engineer** means any potential or actual engineer, consultant or similar individual in relation to an Assignment.

**Referee** and/or emergency contact means a person whose personal details a engineer provides for the purposes of providing a reference or acting as their emergency contact.

**Services** means temporary or permanent recruitment, resourcing, agency, outsourcing, consultancy, project management or similar services.

**Apps** means any mobile application software developed or operated by, licenced to, or owned by ITARMI.

**Assignment** means any temporary or permanent assignment, role, project or other similar deliverable offered, provided or made available to Engineers.

**Website** means any website developed or operated by, licenced to, or owned by ITARMI, including **[www.itarmi.com](http://www.itarmi.com)**.



## WHAT DOES ITARMI DO?

Our core mission has two main goals.

Firstly, we aim to help engineers develop their careers. We do this by matching people with Assignment opportunities, as well as providing wider services to help them develop their careers, such as invitations to networking events and opportunities to take part in research.

Secondly, we work with Customers to help them solve significant recruitment, talent, technology and other related challenges.

These goals mean that we need to collect personal information on individuals in the course of our business.

## WHERE DO WE COLLECT PERSONAL INFORMATION FROM?

**Engineers:** We collect, store and use personal information, either: through your interaction with our Website, our Apps or other software applications operated by us; as a result of you responding to an advertisement posted by us on a job board, online CV library or social media; as a result of us matching your CV, as uploaded by you onto a job board, online CV library or a social media site, to a vacancy we are seeking to fill for a Customer; as a result of personal recommendations; from your business card; or otherwise in the course of us providing Services to you. We also obtain information from certain third party sources and agencies in the course of verifying certain aspects of an Engineer's profile or background.

**Customer contacts:** we collect, store and use personal information which you provide to us or which you post online (for example, on social media or jobs board) or through your interaction with our Website, our Apps or other software applications operated by us.

## WHAT PERSONAL INFORMATION DO WE COLLECT?

**Engineers:** ITARMI collects and holds personal data about Engineers that it needs in order to perform its role. As a minimum, this data will normally include details of: personal identity; career, qualifications, skills and experience; contact information; income, financial and bank information; right to work; information about you and your devices which is derived from your use of our Website and Apps.

**Referees and emergency contacts:** we collect basic contact details (such as name, title, address, email address and telephone numbers) so that we can contact you for a reference or as an emergency contact for one of our engineers.

**Customer contacts:** we need to collect a range of information about you as an essential part of providing our Services, including: contact details, information you provide to us or which is derived from public domain sources such as advertisements or social media channels; information about you and your devices which is derived from your use of our Website and Apps.



## WHAT IS OUR LAWFUL BASIS FOR PROCESSING YOUR PERSONAL DATA?

We must have a lawful basis for processing your data.

In most cases, we consider that it will be necessary for our legitimate interests as a recruitment business to process your personal data. This is based on us having carried out a 'balancing test' to ensure that our processing is necessary and that your fundamental rights of privacy are not outweighed by our legitimate interests.

In certain instances, we will have another lawful ground for processing your data, such as compliance with our legal obligations, or where it is necessary for the performance of contracts related to our Services, or we may need to process the information if we are required to do so in order to comply with any law or regulation or a formal governmental or regulatory investigation.

As regards instances where we act on behalf of a third party and the third party decides how and why personal information is being processed, the handling of your personal data will be governed by the third party's privacy policy.

Where we are required by law to obtain your consent to the processing of your personal data we will obtain it. An example of this will be where we obtain information relating to criminal records checks (for example, from the Disclosure and Barring Service in the UK or as voluntarily disclosed by you). We will also implement any other legally required data protection measures in relation to such data.

Currently we do not carry out automated processing of data without any human involvement. If we utilise technologies that allow us to do this in the future, we will update our Privacy Policy and you will then have certain rights in relation to this type of processing.

## HOW DO WE SHARE YOUR PERSONAL INFORMATION AND WHO DO WE SHARE IT WITH?

When your personal data is processed by us, we will ensure that: access to your personal data is restricted to staff who are required to process the data in the course of their job; only necessary information is released to relevant employees. In addition, we have set out below how we share your information with third parties.

**Referees:** unless you specify otherwise, we may share this information with any of our group companies and relevant Customers. They do not have any independent right to share this information.

**Service and Site usage information:** we may share this anonymous information generated by our Services with our Customers.



**Third-party service providers:** we may share personal information with third-party service companies in order for them to facilitate and support us in the provision of the Services. These third parties include, for example: IT support service providers, providers of credit reference, vetting and screening services, payment processors and software providers. These organisations are appointed by us as data processors and authorised to use your personal information only as necessary to provide the relevant services to us. These organisations are required to process such information based on our instructions and in accordance with this Privacy Policy. They do not have any independent right to share this information.

**Group companies:** we may provide personal information to our parent, subsidiary or affiliated companies for the purpose of processing personal information on our behalf to provide our Services. These parties are required to process such information based on our instructions and in accordance with this Privacy Policy. They do not have any independent right to share this information.

**Compliance with laws and legal proceedings:** we may be required to respond to court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. We may also share information in order to investigate, prevent or take actions against illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our terms of use, or as otherwise required by law.

**Customers:** we may share engineer personal information with relevant Customers where we believe that an engineer may be appropriate for a particular Assignment or an engineer has been assigned to an Assignment, we will share an engineer's personal information to the extent that it is necessary for the purposes of the Services or related legal, tax or other administration purposes.

**Engineers:** we may share customer personal information with relevant engineers to the extent that it is necessary for the purposes of the Services or related legal, tax or other administration purposes. They do not have any independent right to share this information.

### **International transfers**

We want to make sure that your data is stored and transferred in a way that is secure. We will only transfer data outside of the European Economic Area (EEA) where we are satisfied that the recipient has policies and measures in place which are consistent with the data protection legislation that applies to us based on certain steps that we may take. These steps may include using certain contractual clauses, relying on the EU-US Privacy Shield framework, or relying on the legal framework of a country which has been deemed to provide an adequate level of protection for personal data by the European Commission.



We may send your information between our group companies which may exist outside of Europe, to overseas Customers or to Customers within your country who may in turn transfer your data internationally. The data may also be stored on cloud-based storage for parts of our overall business process.

Please be aware that countries which are outside the EEA may not offer the same level of legal protection for your personal information as under UK law, although any collection, storage and use of your personal data by us (or on our behalf) will continue to be governed by this Privacy Policy.

## COOKIES

Cookies are small text files containing information which are downloaded to your device when you visit a website or use an app. Cookies are sent back to the originating web domain on your subsequent visits to that domain. As most web pages contain elements from multiple web domains, your browser may receive cookies from several sources when you visit a website or an app.

Cookies are useful because they allow our Website and Apps to recognise your device. Cookies assist us in identifying which sections of our Websites are frequently visited. Cookies allow you to navigate between pages more efficiently, store or remember your preferences and generally improve and personalise your user experience. Cookies can also be used to tailor advertising to your interests through tracking your browsing across websites.

You can control our use of cookies at your individual browser level. If you reject cookies, you may still use our Websites and Apps, but your ability to use some their features or areas may then be limited.

## PERSONAL INFORMATION AND THIRD PARTY WEBSITES

The personal information that we collect may be routed through one of our 3rd party suppliers before it is delivered electronically to us. All of our 3rd party suppliers have been vetted to ensure that they will meet our own privacy and security standards in the collection and processing of your personal information.

Our Websites or Apps may also link or direct you to other websites or external content, which are not within our control. Links to other websites may be provided for your convenience and information. While we will aim to link or direct you only to websites that share our privacy and security standards, we are not able to guarantee this and we will not be responsible for the protection and privacy of any personal data which you provide on those websites. These websites will have their own privacy policy and measures in place, which we recommend that you review carefully if you visit any such websites.



## HOW WE PROTECT YOUR PERSONAL DATA

We have adopted robust technologies and policies that are designed to prevent unauthorised or unlawful access to and misuse of your personal data. 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 contact us using the e-mail address above.

Your information is held on servers hosted by us or our Internet Service Provider. Unfortunately, the transmission of information via the internet is not completely secure. Although we will take steps to protect your personal data, we cannot guarantee the security of your data transmitted to our Website; any transmission is at your own risk.

Where you have chosen a password that allows you to access certain parts of our Website or our Apps, you are responsible for keeping this password confidential. We strongly advise you not to share your password with anyone.

## DATA RETENTION

We won't keep data for any longer than is necessary. For most people where we have limited contact it will be for a maximum of two years from the date of last contact with us. Where we have engaged with you more actively or extensively, for instance we have worked with you as an Engineer or as a Customer, we may retain data longer for the purposes of potentially providing Services. We will securely delete your data after that time, except where we need to keep any personal information to comply with our legal obligations, resolve disputes, or enforce our agreements.

## YOUR RIGHTS, COMPLAINTS, QUESTIONS AND SUGGESTIONS

You have certain rights in relation to your personal information, which are provided for under data protection legislation. If you would like to exercise these rights, please contact us using the e-mail address above.

We take any complaints we receive about this seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or otherwise in breach of their rights. If you wish to complain about this policy or any of the procedures set out in it please contact our Data Protection Officer at the e-mail address above.

## MARKETING ACTIVITIES

Periodically we may send you information for various reasons, such as seeking your expertise or experience in completing a survey, in order to market our full range of services, to invite you to networking or Customer events, or to let you know about the industry sectors we think may be of interest to you. Subject to any applicable local laws and legal requirements, we will not, as a matter of course, seek your consent when sending marketing materials relating to the above, but we will give you the option to unsubscribe of any such e-mails.



Where we have previously engaged with you (for example, where you have submitted an application or CV to us or carried out an Assignment) or where you have posted your details on a job board, social media or similar, we will assume that you have given permission for us to contact you with details of Assignments which we believe will be of interest to you. You will have the right to withdraw such permission at any time.

#### CHANGES TO OUR PRIVACY POLICY

This privacy policy was last updated on 26 March 2020. Please check back regularly to keep informed of updates to this privacy policy. Where we make significant changes to this privacy policy and we have your e-mail address, we will notify you of the new policy. If you are an active user of our Apps, we may send you a notification through the App.

#### READ MORE: WHAT PERSONAL DATA DO WE COLLECT?

**Engineers:** the information that we may collect from or about you include: your full name; date of birth; your bank details; details of your driving licence, national identity card and/or passport (including passport photograph); contact information, including postal address, telephone numbers, email details; user name/ID and passwords; your current and previous employment/work details, including job title, dates of employment, employer and income; financial related information; details of your education, certifications, qualifications, skills and experience and contents of your CV, resume or completed application form; information in personal website, social media profile or links, job board (whether by you or a third party), or in any news media; other details about your abilities, including psychometric evaluations and reasoning/skills tests; nationality, citizenship, right to work status; referee details; details of your umbrella company or personal service company; information from the contract between you (or your umbrella company or personal service company) and a Customer, including timesheet data, charge rates and work performed; details of references (including Customers or previous employers) and emergency contacts; details of any communications between any of you, us, Customer or other relevant parties (including e-mails and any attachments).

We may also need to collect additional information about you in order to complete a contract for you and/or our Customer where we are doing this on your behalf.

We may collect the results of pre-Assignment screening or vetting checks, such as the results of right to work and criminal record checks to comply with relevant immigration legislation.

In relation to your use of our Website and Apps, we collect certain information about your hardware and Devices, such as your IP address, information about your location from time to time.

We may also collect other personally identifiable data, for instance, your marital status, race or ethnic origin, gender, religion, sexual orientation, or disability status, if we carry out equal opportunity monitoring. This will be subject to obtaining your consent and implementing any other legally required data protection measures.





**Customer contacts:** the information that we will usually collect from or about you will include: your name; your postal address; your telephone and e-mail details; details of your role, title and responsibilities within your organisation; any opinion, feedback or queries you share with us regarding an Engineer or our Services; details of any recruitment, resourcing or business requirements or plans you share with us; information from your business card (provided by you or someone else) or other similar information at networking, industry or marketing events; information from items, advertisements or similar on job boards or through social media or similar channels; information arising from Services we provide to you or from contractual or similar documentation relevant to the Services; information derived from your interaction with a Website or an App operated by us, such as your IP address.

#### READ MORE: [LAWFUL GROUNDS FOR PROCESSING YOUR PERSONAL DATA](#)

We must have a lawful basis for processing your data. We have summarised below the reasons for our collection and processing of data and the lawful ground of processing that we consider applies.

**Engineers:** We use the data we gather to perform a number of tasks, for example: placing Engineers into a Assignments; the provision of Services to Customers, including resourcing, outsourcing or consultancy; maintaining our records of Engineers, Customers and relevant contacts; administrative purposes, such as contract administration, payroll and invoicing. We may use information about your disability status to consider whether we need to (and whether we need to ask Customers to) make appropriate adjustments during the recruitment process.

**Customer contacts:** We use the information collected from Customers to try to ensure that we provide better, more optimised services to them and vice versa and, more generally, to ensure that the business arrangements between us run smoothly, including identifying engineers that meet their requirements, or providing other business services from our portfolio, as well as administrative purposes, such as contract administration, payroll and invoicing.

**Referees and emergency contacts:** we use the data collected to contact you for a reference or to contact you as an Engineer's emergency contact in the event of an accident or other emergency.

All users of Websites, App(s) and our Services: We collect, store and use your personal information to make the Website, App(s) and Services available to you and to ensure their ongoing efficiency and improvement; to allow us to aggregate statistics, more effectively administer and back up our Website, App(s) and related databases. We may also use information to enforce our contractual terms with you or under any other agreement, for the exercise or defence of legal claims and to protect our rights and the rights of other Engineers, our Customers or others. We may use the data in conducting marketing, profiling and business development activities as well as market research and statistical analysis regarding our products and/or services (including determining the effectiveness of our promotional campaigns and advertising). We may need to use the information in detecting and preventing fraud and to assist us in keeping our Websites, Apps, products and IT systems secure.



If you submit comments or feedback regarding our Websites, Apps or Services, we may use such comments or feedback on the Website, in the Apps and in any marketing or advertising materials as follows: if you are an Engineer, we will only identify you for this purpose by your first name and the city in which you live; if you are a Customer contact, we will use your comments or feedback on an anonymised basis, unless you give us your explicit written permission (for example, by e-mail) to use your name or the Customer's company name.

**Our lawful basis for processing your data:** as described above, we consider that it is necessary for our legitimate interests as a recruitment business to process your personal data. In relying on legitimate interests as a justification for processing, we have carried out a 'balancing test' to ensure that our processing is necessary and that your fundamental rights of privacy are not outweighed by our legitimate interests. You can find out more information about these balancing tests by contacting us at the e-mail address above.

If you are an Engineer, we think you will have a reasonable expectation that if you are looking for employment or an Assignment and you interact with us or our Website or App(s) or you have posted your CV or other professional information on a job board or professional networking site, that you are comfortable with us collecting and using your personal data to provide Services to you and Customers and for us to share your information with Customers.

At different stages in the recruitment process, we also have other lawful grounds for processing your data such as compliance with our legal obligations and where it is necessary for the performance of contracts related to our Services. We may need to process the information if we are required to do so in order to comply with any law or regulation or a formal governmental or regulatory investigation.

During the recruitment process the Customer may want additional information (such as the results from psychometric evaluations or skills tests) or to confirm your references, qualifications, where appropriate and in accordance with local laws.

If we seek sensitive personal data in order to operate equal opportunity monitoring, we will seek your consent and we will adopt any measures required by law in order to protect this information (for example, we share it only on an anonymised or pseudonymised basis).

You will not be subject to decisions that will have a significant impact on you based solely on automated profiling and decision-making. Our recruitment activities involve some human decisionmaking. This may change in the future if we implement automated technologies or machine learning, but we will only do so where appropriate and in accordance with applicable laws and regulations.

Where the Customer decides how and why personal information is being processed, the handling of your personal data will be governed by the Customer's privacy policy. We will let you know when this is the case.



When we collect pre-Assignment screening or vetting checks during the on boarding process, we will seek your consent to processing such data, including Disclosure and Barring Service checks and any information you voluntarily provide relating to criminal convictions. In these circumstances, you can withdraw your consent at any stage by contacting us at the e-mail address above but this may prevent us from being able to deliver some of our Services to you. In relation to criminal checks data and any other special category data (such as marital status, race or ethnic origin, gender, religion, sexual orientation, or disability status), we have implemented other legally required data protection measures. Wherever we are required by law to obtain your consent to the processing of your personal data we will obtain it explicitly.

#### READ MORE: COOKIES

We may collect the following information during your visit to our Website and/or the fully qualified domain name from which you accessed our Website, or alternatively, your IP address: the date and time you access each page of our Website, the URL of any web page from which you accessed our site (the referrer), the web browser that you are using and the pages you accessed. Some webpages may require you to provide a limited amount of personal information in order to enjoy certain services on our Website (system login credentials, e-mail addresses and contact information). Session cookies are deleted automatically when you close your browser and persistent cookies remain on your device after the browser is closed (for example, to remember your user preferences when you return to the site). This personal information will only be used for its intended purpose, i.e. to respond to your message or deliver our Services. You may configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent.

#### READ MORE: YOUR RIGHTS IN RELATION TO PERSONAL DATA

Under data protection law, you have certain rights in relation to your personal data that is held by us. These are summarised below.

**Right to be informed:** you have the right to be provided with clear, transparent and easily understandable statement of how we use your data and your rights in relation to that data. We believe that this Privacy Policy provides you with this.

**Right of access:** you have the right to access personal information we hold about you. This can help you to check that we are handling your information in accordance with data protection law.

**Right to rectification:** you have the right to have your information corrected if it is inaccurate or incomplete.

**Right of erasure:** you have the right to request the deletion or removal of personal data where there is no compelling reason for its continued processing.

**Right to restrict processing:** you have the right to block the processing of your personal data. When processing is restricted, we can still store your information, but will not use it further.



**Right to data portability:** you have the right to obtain a copy of your personal data in a format that is accessible, which therefore allows you to use it for your own purposes across different services.

**Right to object:** you have the right to object to certain types of processing. You can do this by either disabling cookies, changing marketing preferences, or by contacting us using the e-mail address above.

**Right not to be subject to a decision:** you have the right not to be subject to automated processing where this could produce a significant legal or similar effect on you.

**Right to withdraw consent:** if you have given your consent to our use of your personal information, you have the right to withdraw that consent at any time. You can do this by contacting us at the e-mail address above.

**The right to lodge a complaint:** you have the right to lodge a complaint with the national data protection authority, such as the Information Commissioner's Office in the UK (see [www.ico.org.uk](http://www.ico.org.uk)).

We will consider all such requests and provide our response within a reasonable period (and in any event within any time period required by applicable law). Please note, however, that data protection law provides exceptions from such rights and requests in certain circumstances. If such an exception applies, we will tell you this when responding to your request. We may also request that you provide us with information necessary to confirm your identity before responding to any request you make.

You may request to unsubscribe from e-mail alerts (for example, relating to Assignments or marketing) at any time. If you have chosen to receive push notifications through our App but wish to stop receiving such notifications from us at any time, you can do this by changing your preferences on your mobile device or by contacting us at the e-mail address above.

Current version: 26 March 2020

Previous version: 10 January 2019

