



## ITARMI PRIVACY POLICY

*Last updated: 10 January 2019*

At ITARMI, we take data privacy seriously. This privacy policy explains who we are, how we collect, share and use Personal Data, and how you can exercise your privacy rights.

We have tried to make this policy easily readable. We recommend that you read it in full. However, to make it easier for you to focus on the parts that particularly apply to you, we have divided this policy into sections which apply as follows: Sections 1 and 4 (**Everyone**), Section 2 (**Engineers and Engineer Contacts**), Section 3 (**Customers and Customer Contacts**).

If we provide you with any different or additional privacy policies, we shall let you know how those policies interact with this policy. You may contact us about it by e-mail at: [compliance@itarmi.com](mailto:compliance@itarmi.com).

### 1. THE BASICS

#### *About us*

The **Itarmi Platform** consists of our website, mobile apps and related software and it is owned and operated by Itarmi UK Limited, a company incorporated and registered in England and Wales and its affiliates (**Itarmi, us, we or our**). It enables us to provide Customers with access to engineering resourcing and Engineers with access to Assignments.

#### *Terms used in this policy*

**Assignment** means any engineering assignment, role or project.

**Customer** means any business organisation to which we market, offer or provide the Itarmi Platform and our services.

**Customer Contact** means an individual whose details have been provided to us who is employed by or who acts of behalf of a Customer.

**EEA** means European Economic Area.

**Engineer Contact** means any individual whose personal details have been provided to us for use in relation to an Engineer, including as an emergency contact or to act as a referee for the Engineer.

**Engineer or he** means any individual engineer (irrespective of gender) to whom we market, offer or provide opportunities to carry out Assignments.

**Personal Information** means any information that identifies or can be used to identify an individual directly or indirectly.

**You or user** means any current or potential user of the Itarmi Platform and/or our services (including any Engineer, Engineer Contact, Customer or Customer Contact, or other user).

### 2. ENGINEERS AND ENGINEER CONTACTS

#### *Engineer Personal Information we collect*

**Engineers:** we collect Personal Information about Engineers that we need in order to provide our services. This information includes, for example: name; date of birth; bank details; driving licence, national identity card and/or passport; nationality, citizenship, right to work information; various contact details (including e-mail, telephone, postal address); log-in details; education, career and income history; certifications, qualifications, skills and experience; online information including social media and professional networking profiles; onboarding vetting and test results; criminal records information; personal service company details; information needed to complete a contract for you



and/or Customer; reviews, ratings, comments, suggestions, opinion, feedback or queries you share with us; 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. We may obtain information from third party agencies in the course of verifying certain aspects of your profile or background.

**Engineer Contacts:** we collect various contact details; for referees, your relationship with the Engineer and your current role; we may also verify this information from online and public sources.

#### *Lawful basis on which we use Engineer Personal Information*

**Engineer:** in most cases, we will rely on legitimate interests. If you contact us with a view to seeking Assignments, interact with the Itarmi Platform, or post your information online, we think you will have a reasonable expectation that we will collect and use your personal data in the Itarmi Platform and share your information with Customers and certain other third parties. We may also rely on other lawful grounds for processing your data, such as obtaining your consent (for example, in relation to criminal records information or equal opportunities monitoring). You can read more about legitimate interests, consent and other potentially relevant grounds in Section 4 below.

**Engineer 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.

### **3. CUSTOMERS AND CUSTOMER CONTACTS**

#### *Customer Personal Information we collect*

Personal Information we collect will include, for example: name; various contact details (including e-mail, telephone, postal address); job role, title and responsibilities within your organisation; reviews, ratings, comments, suggestions, opinion, feedback or queries you share with us; 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); information at networking, industry or marketing events; information from advertisements, job boards, social media or similar channels; information arising from services we provide to you or from documentation relevant to the services.

#### *Lawful basis on which we use Customer Personal Information*

In most cases, we will rely on legitimate interests. We use your Personal Information to facilitate the delivery of services to Customers, as well as to try to ensure that we provide better, more optimised services to Customers and other users. We may use your Personal Information to update you about the Itarmi Platform and our services. More generally, we use this for administrative purposes, such as contract administration, payroll and invoicing. You can read more about legitimate interests, consent and other potentially relevant grounds in Section 4 below.

### **4. ALL USERS**

#### *Personal Information we collect from all users*

We may collect, store and use the Personal Information of all users for a range of purposes.

Firstly, we may collect information derived from your interaction with the Itarmi Platform (including information about your devices, such as your IP address, information about your location. We may do this in order to ensure the ongoing availability, functioning, efficiency and improvement of the Itarmi



Platform, as well as to allow us to aggregate statistics, more effectively administer and back up the Itarmi Platform and related databases.

Secondly, we may use Personal Information to enforce contractual terms, for the exercise or defence of legal claims and to protect our rights and the rights of our users.

Thirdly, we may use Personal Information 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).

Fourthly, we may need to use the information in detecting and preventing fraud and to assist us in keeping Itarmi Platform and IT systems secure.

Fifthly, if you submit comments or feedback regarding the Itarmi Platform or our services, we may use such comments or feedback in 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, on an anonymised or pseudonymised basis, unless you give us your explicit consent to use your name and/or the Customer's name.

#### *Lawful basis on which we use this Personal Information*

We must have a lawful basis for processing your Personal Information. Below is an explanation of the relevant grounds of processing.

**Legitimate interests:** in most cases, we consider that it will be necessary for our legitimate interests as a recruitment business to process your Personal Information. In doing so, we have carried out a three-part test: (i) purpose test (identifying the purpose and assessing whether it constitutes a legitimate interest), (ii) necessity test (considering whether the processing actually necessary for our purposes) and (iii) balancing test (considering your interests and fundamental rights and freedoms and whether they override our legitimate interests, taking into account the nature of the data, your reasonable expectations, the likely impact of the data processing and any suitable safeguards).

**Consent:** we will obtain your consent to the processing of your Personal Information where required by law or where we consider that it would be appropriate, whilst also implementing any other legally required data protection measures in relation to such Personal Information. For example, where we carry out criminal records checks, or where we collect special category data (such as marital status, race or ethnic origin, gender, religion, sexual orientation, or disability status) for equal opportunities monitoring purposes (including anonymising or pseudonymising your data, where required). You can withdraw your consent at any stage by contacting us at [compliance@itarmi.com](mailto:compliance@itarmi.com).

**Other lawful grounds:** other potentially applicable grounds for processing are: compliance with our legal obligations, necessity for the performance of contracts related to our services, and disclosure required under applicable laws, regulations or a binding legal order.

**Automated decision-making:** currently we do not carry out decision-making solely on the basis of automated processing of Personal Information. Our services and activities involve some human decision-making. If we adopt automated technologies or machine learning that allow us to do this in a way that will have a significant impact on you, we will update our Privacy Policy and you will then have certain rights in relation to this type of processing.

**Third party privacy policy:** where a 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.



### *Sharing your Personal Information with third parties*

Below are the third parties with whom we may share your information.

**Engineers:** we may share Customer Personal Information with relevant Engineers to the extent that it is necessary for the purposes of delivering our services or related legal, tax or other administration. Engineers do not have an independent right to share this information.

**Customers:** we may share Engineer, Engineer Contact and Customer Contact Personal Information with Customers to the extent that it is necessary for the purposes of delivering our services or related legal, tax or other administration. We may also share anonymised or pseudonymised information generated by our services with Customers.

**Affiliates:** we may share Personal Information with our affiliated companies if such entities process Personal Information on our behalf and/or for the purposes of providing our services. These entities do not have any independent right to share this information.

**Service providers:** we may share Personal Information with third party companies to enable them to support us in the provision of our services. These third parties include providers of software, IT support service, credit reference services, vetting and screening services and payment processing services. We usually appoint such third parties as data processors and authorise them to use your Personal Information only as necessary to provide the relevant services. Personal Information may be routed through a vetted third party supplier before it is delivered electronically to us.

**Compliance with laws:** we may share your Personal Information as required by law, pursuant to court orders, legal proceedings, or as needed to establish or exercise our legal rights or defend against legal claims (including under our Terms and Conditions). We may also share Personal Information with law enforcement authorities and other relevant parties in order to investigate, prevent or take actions against illegal activities, suspected fraud or potential threats to the physical safety of any person.

**Third party websites:** the Itarmi Platform may contain links to third party websites, apps or content that are not within our control. Whilst we will aim to restrict links to websites that share our privacy and security standards, we cannot guarantee this and we will not be responsible for the protection and privacy of any personal data that you provide to those parties. Those parties will have their own privacy policy and measures, which we recommend you review carefully.

### *International transfers of Personal Information*

We may need to transfer your Personal Information outside the EEA, for example, to our affiliated companies, certain service providers or Customers. Certain countries outside the EEA may have a lower standard of data protection laws than is provided within the EEA. Therefore, we will take steps, as required by law, to ensure that EEA Personal Information that is transferred out of the EEA is protected to a standard that is consistent with EEA data protection laws. These steps may include using EU Standard Contractual Clauses or relying on the legal framework of a country that has been deemed by the European Commission to provide an adequate level of data protection for Personal Information.

### *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 a website to recognise your device. Cookies assist us in identifying which sections of a website 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 the Itarmi Platform, but your ability to use some their features or areas may then be limited.

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.

#### *How you and we protect your Personal Information*

We have adopted robust processes, policies and technologies that are designed to prevent unauthorised or unlawful access to and misuse of your Personal Information, and to deal with any suspected data breach. If you suspect any misuse, loss of or unauthorised access to your Personal Information, please contact us [compliance@itarmi.com](mailto:compliance@itarmi.com) as soon as possible.

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 Information, we cannot guarantee the security of your data transmitted to our website. Therefore, any such transmission is at your own risk.

Where you have chosen a password that allows you to access certain parts of the Itarmi Platform, you are responsible for keeping this password confidential. Please refer to our information security polices, available via the Itarmi Platform.

#### *Data retention*

We will not keep your Personal Information for longer than we consider is necessary. In determining the retention period for your Personal Information, we will take into account relevant factors including our contractual obligations and rights, requirements of applicable laws, applicable statutory or claims limitation periods, our legitimate interests (see above), potential disputes, and guidelines issued by competent data protection authorities. Therefore, in most cases, we may retain your Personal Information for six (6) years from the time you stop using our services, but the period may be shorter. We will securely delete Personal Information once it is not required.

#### *Marketing activities*



Periodically, we may send you information for various reasons, such as seeking your expertise or experience in completing a survey, to market our services, to invite you to networking events, or to let you know about items we think may be of interest to you. We will give you the option to unsubscribe from such e-mails.

### *Changes to our Privacy Policy*

Please check back regularly to keep informed of updates to this privacy policy. Where we make significant changes to this privacy policy and you have an active account in the Itarmi Platform, we will notify you of the new policy.

### *Your rights in relation to Personal Information*

As set out below, you have certain rights in relation to your Personal Information.

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

**Right of access:** you have the right to access your Personal Information that we hold. 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 Personal Information corrected if it is incorrect.

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

**Right to restrict processing:** you have the right to restrict processing of your Personal Information. If processing is restricted, we may store your information, but not use it further.

**Right to data portability:** you have the right to obtain a copy of your Personal Information in an accessible format that allows you to use it for your own purposes.

**Right to object:** you have the right to object to certain types of processing. You can do this by either disabling cookies, changing your preferences or contacting us.

**Right not to be subject to a decision:** you have the right not to be subject to automated processing where this could have a significant impact on you.

**Right to withdraw consent:** if you have consented to the use of your Personal Information, you have the right to withdraw that consent at any time.

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

If you would like to exercise your rights, complain about this policy, or if you think our collection or use of Personal Information is unfair or in breach of your rights, you may contact our Data Protection Officer at [compliance@itarmi.com](mailto:compliance@itarmi.com). We will try to respond to you within a reasonable period. We may need you to provide information to confirm your identity before respond. Data protection laws provide exceptions from your rights in certain circumstances. If an exception applies, we will tell you this when we respond.



You may unsubscribe from e-mail alerts at any time. You may chose to stop receiving mobile push notifications by changing the preferences on your mobile device or by contacting us.

**END OF PRIVACY POLICY**