

# PRIVACY NOTICE

## STORM RECRUITMENT UNIT 11, 2<sup>ND</sup> FLOOR CHARLESLAND CENTRE, GREYSTONES, CO. WICKLOW

### 1. INTRODUCTION

- 1.1 STORM RECRUITMENT is strongly committed to protecting your Personal Data. This Privacy Notice applies to your use of the website: [www.stormrecruitment.ie](http://www.stormrecruitment.ie) and sets out how we collect, use and protect your personal data. If you do not agree with the data practices described in this Privacy Notice, please do not use the Site. In the event you wish to withdraw your consent to the data practices described in this Privacy Notice please contact Storm Recruitment at [Siobhan@stormrecruitment.ie](mailto:Siobhan@stormrecruitment.ie)].
- 1.2 This Notice has been developed to ensure our users feel confident about the privacy and security of personal data and to meet our obligations under the Data Protection Acts 1988 to 2018 and the General Data Protection Regulation (the “**Data Protection Law**”). Under Data Protection Law, personal data is information that identifies you as an individual or is capable of doing so (“**Personal Data**”).
- 1.3 We must comply with the data protection principles set down in the Data Protection Law and this Notice applies to all personal data collected, processed and stored by us through your use of the Site.
- 1.4 For the purposes of Data Protection Law, we are the data controller of your Personal Data. You will find our contact details in the “Contact us” section below.

### 2. WHAT KINDS OF PERSONAL DATA DO WE COLLECT?

- 2.1 We receive and store any information you enter on the Site or give us in any other way, including [when registering for an account, uploading your CV, applying for jobs (if so available on the Site), viewing a listing, as well as provided in your comments and requests.]
- 2.2 The Site gives you the ability to register your CV and apply for a position. By offering this functionality, we will collect the Personal Data that you or your computer/device provides to us. We also have database CRM system where we retain all your information for future roles should you wish your information to be retained. This information will vary but typically includes Personal Data, such as:
- your first and last name
  - your e-mail address
  - your mailing address (including town/city and county)

- telephone number
- your qualifications
- previous work experience
- the country in which you reside
- Salary expectations
- References if you choose to provide
- Job categories

2.3 Given the varied functionality of Storm Recruitment we rely on the following legal basis under Data Protection Law in processing your Personal Data:

<b>Legal Basis</b>	<b>Example</b>
performance of a contract	If you register or subscribe to a mailing list or apply for a role via Storm Recruitment we will process your Personal Data to the extent required to deliver the service requested.
compliance with legal obligations	We may need to disclose your identity and other Personal Data to comply with a request from law enforcement, An Garda Síochána / PSNI, police or other government agencies or court order.
Legitimate interests	We may disclose your identity and other relevant Personal Data in connection with any complaint regarding your use of a Site. This is necessary in order to protect us from any liability in relation to your use of a Site.

### 3. HOW WE GATHER DATA AND PERSONAL DATA

3.1 We gather Personal Data from you applying for a role with your CV and through your interaction with us (for example, when you contact us via email or through the Site or by phone).

### 4. HOW WE MAY USE YOUR PERSONAL DATA

4.1 Except as disclosed in this Privacy Notice, we will not disclose Personal Data that we collect to any parties other than those with whom we partner or are affiliated with, without your consent. Except as disclosed below, we will not sell, share, trade, rent, or give away your Personal Data.

## **Information you provide**

4.2 We may use your Personal Data to process any requests made by you (for example, by contacting a Company on your behalf following your request to do so), respond to your inquiry, and communicate with you in respect of job applications when necessary. We may also use information you provide to communicate with you about your interest in our events and our company, to help us improve, operate and enhance your experience on the Site, to promote our events, notify you about important functionality changes to the Site, new services, and special offers we think you will find valuable, to tailor advertisements, content, and other aspects of your experience on and in connection with the Site, for other administrative purposes, to prevent or detect abuses of our terms of use, and to enable third-parties to carry out technical or other functions on our behalf as well as any other purpose that we may disclose to you at the point at which we request your Personal Data..

4.3 If you contact us via the Site, or in any other way, we may retain the correspondence and the information it contains, such as:

- your name
- e-mail address
- the reason for contacting us

We may use the information to:

- respond to your inquiry
- to notify you of related job opportunities

When you contact us, we will request your affirmative, positive consent to use your contact information for marketing or other business purposes. In the event you do not consent to the use of your contact information for marketing or other business purposes, your data will not be used for those purposes. If you provide your consent but subsequently do not wish to receive notifications about related opportunities, or otherwise want to restrict the use of information you provide to us, please follow the instructions on any marketing correspondence or send us an e-mail at the address listed below.

## **Do we disclose Personal Data to anyone else?**

4.4 We shall disclose your information to third parties only when you have authorised us to do so, it is necessary as part of business practices or when there is a legal or statutory obligation to do so. Whenever we disclose information to third parties, we will only disclose that amount of personal information necessary to meet such business need or legal requirement. Third parties that receive your information from the us must satisfy us as to the measures taken to protect the personal data such parties receive, in accordance with Data Protection Law and as stated in this Privacy Notice. Appropriate measures will be taken to ensure that all such disclosures or transfers of your information to third parties will be completed in a secure manner and pursuant to contractual safeguards.

- 4.5 We may employ other companies and individuals to perform functions on our behalf, including payroll company if you are temping for Storm Recruitment, and providing analytics assistance from our Database system.
- 4.6 We may also change our ownership or corporate organisation while providing the CRM system. As a result, we may transfer your information to another company that is affiliated with us, with which we have merged, or which has acquired all or some of our assets. We will advise you if such a change of ownership or change of corporate structure takes place and we will update this Privacy Notice accordingly.
- 4.7 We may provide information, when obliged to do so under the Data Protection Law and in response to properly made requests, for example, for the purpose of the prevention and detection of crime, and the apprehension or prosecution of offenders. We may also provide information for the purpose of safeguarding national security. In the case of any such disclosure, we will do so only in accordance with the Data Protection Law.
- 4.8 We may also provide information when required to do so by law, for example under a court order, and may transfer data to legal counsel where same is necessary for the defence of legal claims.
- 4.9 We may also disclose your identity or any Personal Data in connection with any complaint regarding your use of the Site.

## 5. **HOW LONG DO WE KEEP PERSONAL DATA?**

- 5.1 The period for which we retain information varies according to the use of that information. In some cases, there are legal requirements to keep data for a minimum period of time. Unless specific legal requirements dictate otherwise, we will retain information no longer than is necessary for the purposes for which the data were collected and processed (as described above).
- 5.2 Personal Data may be provided by you through registering with us by sending in your CV. Your Personal Data shall continue to be retained for a period of seven years in accordance with Irish statutory limitation periods. At the end of this period we will contact you and see if you would like to be removed or kept on our database.

## 6. **HOW DO WE PROTECT DATA ABOUT YOU WHEN IF IS TRANSFERRED OUT OF EUROPE?**

- 6.1 Our website is published in Ireland and is governed by Data Protection Law and Irish law. Our Database complies with the EU-US Privacy Shield Framework and the Swiss – US Privacy Shield Framework as set forth by the US Department of Commerce regarding collection, use and retention of personal information transferred from the European Union and Switzerland to the US, respectively. Our Database company has certified to the Department of Commerce that it adheres to the Privacy Shield Principles.

6.2 If this changes at any point in the future, this Privacy Notice will be updated to take account of this change. Note that in this event, any transfer of Personal Data outside of the EEA shall be made through transfer mechanisms approved or allowed for under Data Protection Law and we shall take all necessary steps to ensure that there is adequate protection, as required by Data Protection Law.

## 7. **HOW YOU CAN EXERCISE YOUR RIGHTS IN RESPECT OF PERSONAL DATA WE HOLD ABOUT YOU**

### **Your rights**

7.1 We shall vindicate all your rights under Data Protection Law. These rights are as follows:

- Your right to withdraw your consent to the processing of Personal Data at any time
- your right to request from us access to personal data and to have any incorrect personal data rectified
- your right to the restriction of processing concerning you or to object to processing
- your right to have your personal data transferred to another service provider
- your right to have personal data erased (where appropriate)
- information on the existence of automated decision-making, if any, as well as meaningful information about the logic involved, its significance and its envisaged consequences

Vindication of your rights shall not affect any rights which we may have under Data Protection Law.

### **Exercising your rights, managing information and opting out**

7.2 You may update or change information related to your account by sending us an e-mail. You may also opt-out of receiving future commercial e-mail messages from us or request that your information be removed from our Site by e-mailing us.

7.3 You may also unsubscribe from our marketing communications by clicking on the “unsubscribe” link located on the bottom of our e-mails or by sending us an e-mail.

7.4 You can update or correct your Personal Data, remove it from our system or exercise any of your rights by making a request to us at the contact information provided below. If for some reason access is denied, we will provide an explanation of why access has been denied.

7.5 We will confirm your request within 21 days of receipt and process your request within 30 days of receipt.

8. **HOW DOES THE SITE PROTECT PERSONAL INFORMATION ABOUT YOU?**

8.1 We employ reasonable appropriate administrative, technical, personnel procedural and physical measures to safeguard Personal Data against loss, theft and unauthorised uses access, uses or modifications. Security and testing are performed on systems containing personal data to verify control effectiveness. Security of these systems are monitored continuously.

8.2 When you make requests or access your account information, we offer the use of a secure server. Personal information collected on the Site is stored in secure operating environments. While we try our best to safeguard your information once we receive it, no transmission of data over the Internet or any other public network can be guaranteed to be 100% secure. It is important for you to protect against unauthorized access to your password and to your computer. Be sure to sign off when finished using a shared computer.

9. **HOW CAN YOU MAKE A COMPLAINT ABOUT THE USE OF PERSONAL DATA?**

9.1 Complaints on the use, retention and disposal of personal data can submitted via email to [siobhan@stormrecruitment.ie](mailto:siobhan@stormrecruitment.ie)

9.2 As a candidate you also have the right to lodge a complaint with the Data Protection Commission.

10. **REVIEW**

10.1 This Notice will be reviewed and updated from time to time to consider changes in the law and the experience of the Notice in practice. Any and all changes will be advised to customers and, if necessary, we will obtain your consent prior to applying any changes to any Personal Data collected from you prior to the date the change becomes effective. Your continued use of our Site after such changes will be subject to the then-current Notice. We encourage you to periodically review this Privacy Notice to stay informed about how we collect, use, and disclose personal information.

11. **CONTACT INFORMATION**

11.1 If you have questions about this Privacy Notice or our treatment of the information provided to us, please contact us at:

Name: Siobhan Harding

Address: Unit 11, 2<sup>nd</sup> Floor, Charlesland Centre, Greystones, Co Wicklow

Phone: 01 2557377

E-mail: [siobhan@stormrecruitment.ie](mailto:siobhan@stormrecruitment.ie) [ ]