

MOMENTUM GLOBAL TRADING AS TALENT POINT LTD - PRIVACY POLICY

Talent Point Ltd ("We") is committed to respecting your privacy and protecting your personal data. Please read the following Privacy Policy which sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

We will outline below our views and practices regarding your personal data and how we will treat it. By visiting our website ("our site") you are accepting and consenting to the practices described in this statement.

This policy will be reviewed at least annually, and the most current version will always be available on our website.

Please keep us informed if any of your personal data changes during your relationship with us, as it is important that the personal data we hold about you is accurate and current.

1. Who are we?

We are Momentum Global trading as Talent Point Ltd; our headquarters are located at 15 Bermondsey Square, Bermondsey, London, SE1 3UN.

Contactable at info@momentumglobal.co

For the purpose of the General Data Protection Regulation (Regulation (EU) 2016/679) (the EU GDPR) and the UK General Data Protection Regulation (the UK GDPR), the data controller is Talent Point Ltd.

2. What do we do?

We provide executive search and recruitment services for clients looking to recruit personnel for their businesses. We also provide related services, including data reports and insights, salary and benefits benchmarking, and hiring consultancy.

We collect the personal data of the following types of people to allow us to undertake our business;

- Prospective and placed candidates for permanent or temporary roles;
- Prospective and live client contacts;
- Supplier contacts to support our services; and
- Employees, consultants, and temporary workers.

We collect information from these people in order to carry out our core business and ancillary activities.

3. What does this Privacy Policy cover?

We take the privacy of your personal data seriously. We understand that the information you trust us with is important to you. We are committed to protecting and respecting your privacy. This policy explains how, when and why we collect your personal information. Specifically, this policy:

- sets out the types of personal data that we collect about you;
- explains how and why we collect and use your personal data;
- explains how long we keep your personal data for;
- explains when, why and with whom we will share your personal data;
- sets out the legal basis we have for using your personal data;
- explains the implications of refusing to provide the personal data requested;
- explains the different rights and choices you have when it comes to your personal data; and
- explains how we may contact you and how you can contact us.

This privacy policy applies to all clients, candidates and contractors, referees, third parties and investors. Employees of Talent Point Ltd should refer to the Group's Employee Privacy Statement, which is available on the intranet.

We will comply with data protection law. This says that the personal information we hold about you must be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- relevant to the purposes we have told you about and limited only to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes we have told you about; and
- kept securely.

4. How is your personal data collected?

We use different methods to collect data from and about you including via the methods outlined below.

Direct interactions.

You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise.

This includes personal data you provide when you:

- apply for jobs on our website or via job boards;
- submit your CV to our website, LinkedIn or directly to us via email;
- are referred to us by colleagues;
- subscribe to our service or publications, or attend our events;
- request marketing to be sent to you;
- give us feedback or contact us.

Throughout your dealings with us, calls may be monitored for training and quality purposes.

The information you give us or we collect about you may include:

- your personal contact details such as name, address, private e-mail address and phone number;
- your date of birth;
- gender;
- next of kin and emergency contact information;

- financial information including your National Insurance number, bank account details, payroll records and tax status information;
- compliance documentation and references verifying your qualifications and experience, including and your right to work in the United Kingdom and IR35 status;
- curriculum vitae and photograph; and
- links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website.

For candidates only, please note that we will only collect special category data from you, and make use of this data, once we have asked for, and you have given us, your explicit consent for this.

Special category data is information about any of the following:

- race
- ethnicity
- religious beliefs
- health
- sex life
- sexual orientation
- political opinions
- trade union membership
- genetics and biometrics

Automated technologies or interactions.

As you interact with our website, or call us, we may collect the following types of 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 system and platform;
- information about your visit, including the full uniform resource locators (URL) clickstream to, through and from our site (including date and time), 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 our business.

Please see our cookie policy below for further details.

Third parties or publicly available sources.

We may obtain information about you from other sources such as LinkedIn, corporate websites, job board websites, online CV libraries, your business card, personal recommendations or by word of mouth. For example, you may be recommended by a friend, a former employer, a former colleague or even a present employer. In this case we will inform you, by sending you an email notification, within a maximum of 30 days of collecting the data of the fact we hold personal data about you, and for what purpose we intend to retain and process your personal data.

We may also receive information about you from our relationships with third parties including business partners, sub-contractors in technical, professional, payment and other services, advertising networks, analytics providers, search information providers and professional advisors. We may receive information about you from them for the purposes of our recruitment services and ancillary support services.

5. How will we use your personal data?

We will only use your personal data when the law allows us to. Our business purpose is the fulfilment to find skilled professionals who make strong candidates for the relevant positions our clients are searching for. We therefore must collect necessary information to identify individuals as relevant candidates. Therefore, our legal basis for the processing of personal data is our legitimate interests, although we will also rely on contractual obligations to which you are subject, legal obligations and consent for specific uses of data.

We will use information about you in the following ways:

- to make it (including your CV) available to our consultants in connection with the recruitment process, unless you request otherwise;
- to make it (including your CV) available to our clients in connection with a specific vacancy, where you have agreed to this;
- if you have applied for a job the information you provide, including your CV identifying you by name, will be used to determine your suitability for the position and, if applicable, in determining terms of employment or engagement;
- if your application is unsuccessful, we may try to find you employment or work with alternative clients and may, therefore, disclose your details to other prospective employers and clients in connection with the recruitment process (which for these purposes includes the process of gaining employment and any ongoing administrative process involved, unless you tell us otherwise);
- if required by law or for the purposes of our business requirements (e.g. to auditors or third party service suppliers);
- to provide you with information about other services and opportunities we offer that are similar to those that you have already enquired about;
- to invite you to participate in relevant surveys that might be of interest to you;
- to carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us;
- to notify you about changes to our service;
- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer or other devices;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about services that may interest you or them; or
- in management information used to monitor recruitment initiatives.

Should we want or need to rely on consent to lawfully process your data we will request your consent orally, by email or by an online process for the specific activity we require consent for. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.

6. How will we share or disclose your personal data?

We will share your personal data with selected third parties including with:

- prospective employers and/or clients for the purposes of assessing your suitability;
- candidates for the purpose of arranging interviews and engagements;
- relevant third party partners, including job boards and audit and assessment companies for the performance and compliance obligations of any contract we enter into with them or you;
- advertisers and advertising networks that require the data to select and serve relevant adverts to you and others;
- third party suppliers who assist with the performance of our business, including software providers;
- prospective buyers or sellers of any business or assets in which we are interested in buying or selling;
- third parties which acquire all or substantially all of our assets or those of one or more of our subsidiaries, in which case personal data held by it about its candidates and clients will be one of the transferred assets; and
- third parties where we are under a duty to disclose or share your personal data to comply with any legal obligation or to assist a connected party with their legal obligation, or in order to enforce or apply our terms of use and other agreements, or to protect the rights or property of our, our customers' or others' safety.

7. Where is your personal data stored?

Information can be provided to us in different forms, and we maintain appropriate security measures to protect the data we receive. Whilst we will do our best to protect your personal data, the transmission of information via the internet is not completely secure. We therefore cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we have put in place appropriate security measures to try to prevent unauthorised access, misuse or loss.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

If you suspect any unauthorised access to or misuse or loss of your data, please contact us immediately using the contact details below.

8. Transfer of data outside of the EEA

The data that we collect from you may be transferred to, and stored at, a destination outside the UK or the European Economic Area ("EEA"). It may be transferred to third parties outside of the UK or the EEA for the purpose of our recruitment services. It may also be processed by staff operating outside the UK or the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, our recruitment services and the provision of support services. By submitting your personal data, you agree to this processing.

Most commonly, your personal data may be transferred internationally in the following circumstances:

- to third parties (such as advisers or other suppliers to Talent Point Ltd);
- to clients within your country who may, in turn, transfer your data internationally; and

- to cloud-based storage providers or software suppliers utilised by Talent Point Ltd whose servers are located overseas.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy, and will therefore only transfer data outside of the EEA where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data.

9. How long do we keep your personal data?

We understand our legal duty to retain accurate data and to only retain your information for as long as we need it for our legitimate interests or where you are happy for us to do so. However, please be advised that we may retain some of your information after you cease to use our services, for instance if this is necessary to meet our legal obligations, such as retaining the information for tax and accounting purposes.

We do the following to try to ensure that the data we hold is accurate:

- prior to making an introduction we check that we have accurate information about our candidates; and
- we keep in touch with you so you can let us know of changes to your personal data;

We have a data retention notice and run data routines to remove data that we no longer have a legitimate interest in maintaining. When determining the relevant retention periods, we will take into account factors including:

- our contractual and legal obligations to retain data for a certain period of time;
- our legitimate interests;
- any (potential) disputes;
- if you have made a request to have your information deleted; and
- guidelines issued by relevant data protection authorities.

We may archive part of or all your personal data, retain it on our financial systems only or delete all or part of the data from our main Customer Relationship Manager (CRM) system.

Our current retention notice is available upon request.

10. Use of automated profiling tools

We do not carry out any automated profiling in our recruitment process.

11. Direct Digital Marketing

We will use and process your data to send you direct marketing about:

- invitations to participate in market research and surveys, for example salary surveys;
- for candidates, new job opportunities which may be of interest to you; or
- news and information about Momentum Global.

You will only receive such direct marketing from us if you have opted-in to receive these communications, or we believe it is in your business interest to receive the communication.

You have the right to ask us not to process your personal data for marketing purposes at any time by contacting us at info@momentumglobal.co

12. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back to see any updates or changes to our privacy policy.

13. Links to third party sites

Our site may, from time to time, contain links to and from the sites of our partner networks, advertisers and affiliates. If you follow a link to any of these sites, please note that these sites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these sites.

14. Your rights

The UK GDPR provides you with the right to:

- **Request correction** of personal information that we hold about you.
- **Request erasure** of your personal information.
- **Object to processing** of your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing.
- **Request restriction of processing** of your personal information.
- **Request the transfer** of your personal information to another party, if practicable.
- **Make a complaint** to a supervisory body which in the United Kingdom is the Information Commissioner's Office (ICO). The ICO can be contacted through this link: <https://ico.org.uk/concerns/>. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

You also have the right to **request access to your personal data** (commonly known as a "data Subject Access Request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

If you want to access your personal data, please email info@talentpoint.co detailing what information you require, and providing your full name and postal address as a way of confirming your identity.

We will confirm with you what the response date will be, which will usually be within one month. We are entitled to refuse the request if it is deemed excessive or a repetition of a previous request.

15. Cookie policy

Our sites use cookies to distinguish you from other users of our sites. This helps us to provide you with a good experience when you browse our sites and also allows us to improve our sites. A cookie is a small text file that is stored by your browser on your device or the hard drive of your computer, if you agree. Cookies contain information that is transferred to your computer's hard drive or device.

We use the following cookies:

- **Functional cookies:** these are cookies that are required for the operation of our site. They include, for example, cookies that enable you to log into secure areas of our site;
- **Statistics cookies:** they allow us to recognise and count the number of visitors and to see how visitors move around our site when they are using it. This helps us to improve the way our site works, for example, by ensuring that users are finding what they are looking for easily; and
- **Marketing cookies:** these are used to recognise you when you return to our site. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of region). These cookies record your visit to our site, the pages you have visited and the links you have followed. We will use this information to make our site and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

16. How to contact us

If you have any questions about this privacy policy or our privacy practices, please contact us in the following ways:

Post:

15 Bermondsey Square, Bermondsey, London, SE1 3UN

Email address:

info@momentumglobal.co

Please note that we may keep a record of your communications to help us resolve any issues which you raise.