

PRIMAL HR (U) LTD

PRIVACY POLICY

This privacy policy sets out how PRIMAL HR (U) LTD uses and protects any information that you avail it when you use this website and services.

PRIMAL HR (U) LTD is committed to ensuring that your privacy is protected, and our website complies with the principles of the Data Protection and Privacy Act, Act 9 of 2019. Should we ask you to provide certain information by which you can be identified when using this website then you can be assured that it will only be used in accordance with this privacy statement.

PRIMAL HR (U) LTD may change this policy from time to time and update this page to keep in line with any government or legal changes, as well as company policies. You should check this page regularly to ensure that you are happy with any changes. This policy is effective from January 2023.

WHO WE ARE:

PRIMAL HR (U) LTD is a human resource consultancy and recruitment business as defined by The Employment Act 2006 and the Employment Regulations 2011.

As we are a human resource consultancy company, this means that in order to help individuals such as clients or candidates, we will need to obtain certain types of information to aid in the job search.

WHAT WE COLLECT

We collect the personal data of the following types of people in order to undertake our core business.

- Prospective and placed candidates
- Prospective and live client contacts
- Supplier contacts to support our services
- Employees and Consultants

We may collect the following information:

- Name and address
- Current job title, salary, earnings and benefits
- Contact information including email addresses and telephone numbers
- Demographic information such as postcode, preferences and interests
- Compliance documentation and references
- Other information relevant to customer surveys and/or

As we are not an agency or umbrella company, it is very unlikely that we will need to obtain payment information such as bank details from individuals, however on rare occasions this may happen if we need to act as an intermediary between the client and candidate.

WHY WE COLLECT INFORMATION

We use information held about you in the following ways:-

To provide you with information, products and services that you may request from us or we think will be of interest to you because it is relevant to your career or to your organisation.

The core service we offer to our candidates and clients is the introduction of candidates to our clients for the purposes of temporary or permanent engagement. However, our service expands to supporting individuals throughout their career and to supporting businesses' human resource needs and strategies.

Our legal basis for the processing of data is our Legitimate Business Interests, described in more detail below. We will in some instances rely on consent for particular use of your data and you will be asked for your express consent, if legally required. Examples of when consent may be the lawful basis for processing include permission to introduce a candidate to a client.

OUR LEGITIMATE BUSINESS INTERESTS

Our legitimate interests in collecting and retaining your personal data is described below:-

As a recruitment business we introduce candidates to clients for employment. The exchange of personal data of our candidates and our client contacts is a fundamental, essential part of this process.

In order to support our candidates career aspirations and our clients resourcing needs we require a database of candidate and client personal data containing historical information as well as current resourcing requirements. To maintain, expand and develop our business we need to record the personal data of prospective candidates and client contacts.

HOW WE MAY SHARE YOUR DATA

We may use and disclose personal information about you for the purpose of assisting you in your job search. We may disclose personal information to potential employers, nominated referees; any person or body we are required to disclose to by law; to past educational organisations to

verify qualifications and to competent organisations that conduct background and/or criminal record checks (so long as such organisation undertakes to comply with privacy laws and keeps all supplied information, confidential).

In addition, we require your data for the following reasons:

- Internal record keeping
- Use for our website.
- To notify you about changes to our service
- We may periodically send emails about new information which we think you may find interesting using the email address which you have provided
- From time to time, we may also use your information to contact you for market research We may contact you by email, phone, fax or mail. We may use the information to customise the website according to your interests.

WHERE WE STORE AND PROCESS YOUR PERSONAL DATA

We keep your information on our electronic database. We access this database daily for our day to day business activities from a secure platform which is password protected and has strict user restrictions.

The data that we collect from you may/will be transferred to, and stored at, a destination outside Uganda.

It may be transferred to third parties outside Uganda for the purpose of our recruitment services. It may/will also be processed by staff operating outside Uganda who work for us or 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 transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

All information you provide to us is stored on our electronic database. Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal data, we 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 will use strict procedures and security features to try and prevent unauthorized access.

As an environmentally conscious business, we try to limit any printed materials, especially any that contains personal information. In the event that we do have any printed personal information e.g. a CV, it is company policy that documents are not left on desks and are locked away each evening. We shred all confidential paperwork on a daily and weekly basis.

Senior management oversees ensuring that data records are kept confidential and secure. To prevent unauthorized access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect verbally and electronically and all of our employees are aware of this through our company policies and their contracts of employment.

HOW WE USE COOKIES

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not.

A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

LINKS TO OTHER WEBSITES

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

CONTROLLING YOUR PERSONAL INFORMATION

We value our customers and their privacy and we will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so.

We aim to keep your data for as long as required, we do regular checks with our candidates to find out if the data we hold on them is correct and if they still would like to be kept on our system or if they still wish to be contacted regarding any job opportunities we have.

- If you wish to send us a copy of your CV via our website, it is essential that you have read our privacy policy as stated.
- you have the right to request what information we hold on you
- you have the right to ask for any information we hold on you to be updated or deleted

If you believe that any information we are holding on you is incorrect or incomplete or you would like it deleted then please contact us either verbally, or in writing at the below contact details.

CHANGES TO OUR PRIVACY NOTICE

Any changes we make to our privacy notice in future will be posted on this page and, where appropriate, notified to you by e-mail. Questions, comments and requests regarding this Privacy Notice are welcomed and should be addressed to

Email: info@primalhr.com