

Personal information we may collect from you

- We may collect personal information on your visits to the Website including, but not limited to, your IP address, browser, timestamp, traffic data, location data, weblogs, content from surveys and contact forms and other communication data and the resources that you access. Our collection of this personal information will make your visit to the Website easier in the future as we will be able to suggest content that is relevant to you based on the location you access the Website from, what content you access and how you interact with it.
- We may also collect information for marketing purposes and analysis, including information on how you respond to email, sms, phone and other marketing campaigns.
- We will collect any information you provide to us when you use our contact forms (for example “Contact”, “Contact us today”, “Send us a message”, or “Contact us about working together”). The provision of your personal information via our contact forms is not a statutory or contractual requirement; however, please note that fields marked with an asterisk (*) are mandatory fields, because we need this information to comply with or respond to your request, or to improve your future experiences with us and our Website. Other information or personal information you share with us when completing our contact forms is at your sole discretion. If you contact us, we will keep a record of that correspondence.
- Fields we may request include but are not limited to: your First name, Last name, Company name, Job title, Business email address, Telephone number, Number of permanent employees in the UK&Ireland, Job function, Job level, Industry, Biggest challenge, Current recruitment model, Your location, Sector, Have you ever worked with any of these brands?, Company registration number, Purpose of attendance (at an event), Size of opportunity, Type of staffing need
- We use your personal information to send you direct marketing via email and other communication means when you opt-in for this purpose in the relevant contact form. You may opt-out of receiving future marketing communications at any time by emailing hello@newtonfirst.co.uk

How we use your personal information

Your personal information will be collected and handled by us for the following purposes:

- to provide you with the services you expect us to
- to best tailor content and resources according to your preferences.
- to respond to your request or questions when you contact us.
- with your consent we may also use your contact data for direct marketing to inform you about services/products/events etc that might be of interest to you (we will communicate by email, telephone, mail and/or other communication methods)
- to send to you other information – such as NewtonFirst upcoming events or newsletters – that may be of interest to you.
- to help us create, publish, and improve content most relevant to you.
- to ensure that the content provided through the Website is presented in the most effective manner for you and for your device.

- to allow you to participate in interactive features of our Website, when you choose to do so.
- to further develop and improve the Website and systems to better serve you. This mainly takes place in the context of new IT systems and processes so that information about you may be used in the testing of those new IT systems and processes where dummy data cannot fully replicate the operation of the new IT system.
- to perform analytical research on our prospective client and candidate base, including the content, and the services/products they are interested in
- to transfer data to third parties (see below)
- where necessary, to comply with any legal obligation; and
- we may also process your information to:
 - a. investigate or respond to incidents and complaints
 - b. comply with obligations and rights and cooperate with investigations carried out by the police, government or regulators.

What does the law say about this?

Our use of your information as described above is permitted by applicable data protection law because it is:

- necessary for our legitimate interests in pursuing the purposes set out above, and such interests in each case not being overridden by your privacy interests;
- in some cases, necessary to meet our legal or regulatory responsibilities, such as disclosures to authorities, regulators or government bodies; or
- in some cases, necessary for the performance of a task carried out in the public interest and, when we use special categories of personal information, necessary for establishing, exercising or defending legal claims or where the processing relates to personal information manifestly in the public domain;
- in limited circumstances, processed with your consent which we obtain from you from time to time, such as when you opt-in to receive marketing communications and news, via email and other communication means.

Do you have to give us the personal information we ask for?

You are not obliged to provide your personal information to us when generally navigating our website, however we cannot fulfil any specific requests for information or provide you with a tailored service unless you do so.

How long do you keep my personal information for?

We will keep your information for as long as you wish to receive our communications and thereafter for the longer of the period required in order to meet our business, legal or regulatory responsibilities. Typically this is for 2 years.

Sharing with third parties

To facilitate our efficient use of your information, and to provide you with content and/or resources, or to fulfil a request you make of us, we disclose your information to third parties. However, this disclosure will only occur in the following circumstances:

- **To suppliers, contractors and agents:** from time to time we may engage or employ other companies and individuals to perform functions on our behalf. Examples include the hosting and/or maintaining of website content, or the provision of certain features contained on the Website, and the provision of marketing services.
- Such recipients will only have access to your personal information as required by them to perform their functions, and are not permitted to use such personal information for any other purposes. These recipients will be subject to contractual confidentiality obligations.
- **To other entities belonging to the NewtonFirst Group** (i.e. any companies directly or indirectly controlled by the NewtonFirst Group). We share your data with them so that we can better serve you or, simply, to fulfil your requests (e.g. when you use contact us forms).
- **To government or law enforcement authorities** if we determine in our sole discretion that we are under a legal obligation to do so.

IP addresses and cookies

We collect information about your computer, including (where available) your IP address, operating system and browser type, for system administration. This is statistical data about our users' browsing actions and patterns, and we will not use it in isolation to identify you or any individual. If you provide us with personal data, such as your name, we will then match your IP address and browsing history (for example) with that personal data.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on your device. Cookies help us to improve the Website and to deliver better and more personalised content.

If your computer is shared with other people, we advise that you do not select the 'remember my details' option when that option is offered by the Website.

Where your personal information is stored and processed

As explained in the "Sharing with third parties" paragraph above, we share your personal information with the following:

- **Third party suppliers, contractors or agents:** where we use a third party supplier, contractor or agent, your personal information remains under our control and we have controls in place to ensure your personal information is adequately protected.
- **Other companies in the NewtonFirst Group:** we have entered into a groupwide arrangement to ensure your personal information continues to be subject to an adequate level of protection.

We endeavour to take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Policy.

Do we transfer your data outside the European Union?

Your personal information can be transferred and processed in one or more other countries, in or outside the European Union. We shall only transfer your data outside the EU to countries which the European Commission believes offers an adequate level of protection to you, or where the NewtonFirst Group has put in place appropriate safeguards to seek to preserve the privacy of your information. Those countries include the US.

Data Security

Although we will do our best to protect your personal information, you should be aware that the transmission of information via the internet is not completely secure and we cannot guarantee the security of your personal information transmitted to the Website or any third party; for this reason, any transmission is at your own risk. We will use strict operational procedures and adequate, technical and organisational security measures to prevent any unauthorised access, change, deletion or transmission of this personal information.

Your rights. How you can access, correct and delete your personal information

Under applicable data protection laws, you have the following rights:

- **Right to access and obtain a copy of your personal information:** You are entitled to request confirmation whether we process any of your personal information. Where this is the case, you may have access to your personal information and to certain information about how it is processed. In some cases, you can ask us to provide you with an electronic copy of your information.
- **Right to correct your personal information:** If you can demonstrate that personal information we hold about you is not correct, you can ask that this information is updated or otherwise corrected.
- **Right to be forgotten/have data deleted:** In certain circumstances, you have the right to have your personal data deleted. You may make such a request at any time and NewtonFirst will evaluate if your request should be granted, however this right is subject to any legal rights or obligations we may have to retain data. For situations where, in accordance with the law, we determine that your request to have your personal information deleted must be granted, NewtonFirst will do so without undue delay.

To exercise your rights, you can contact us at the following address: hello@newtonfirst.co.uk

To the extent our processing of your personal information is based on your consent, you also have the right to withdraw your consent at any time. Withdrawal of your consent will not affect the lawfulness of any processing based on your consent before the receipt of such withdrawal.

You can also lodge a complaint about our processing of your personal information with your local data protection authority.

Marketing communications

We will only send marketing communications to you via email or other communication means where you have consented that we may do so.

We will usually offer you a check box on the forms we use to collect your personal information where, if you agree to receive marketing communications, you have to click the box. Where we send marketing communications to you via email, you may opt out of receiving any further marketing communications by clicking the 'unsubscribe' or 'opt-out' function in the email. In addition, you can also exercise your opt-out right at any time by contacting us at hello@newtonfirst.co.uk and providing the following information: your name, your email address, a contact telephone number, the marketing communications you would like to opt out of receiving.

Changes to this Policy

The terms of this Policy may change from time to time. We shall publish any material changes to this Policy through appropriate notices either on this Website or contacting you using other communication channels.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to hello@newtonfirst.co.uk

You can request a copy of mechanisms relating to a specific transfer of your personal information by contacting hello@newtonfirst.co.uk

You can also contact our local data protection representative at the following address: hello@newtonfirst.co.uk