



Cowley Brown Ltd t/a Cowley Brown Recruitment Statement of Privacy & Data Policies

1. General Statement

Your right to privacy and our treatment of your Personal Data is very important to us. Any personal information which you volunteer will be treated with the highest standards of security and confidentiality, in accordance with General Data Protection Regulation (“GDPR”).

2. Data Audit

Cowley Brown Recruitment has recently conducted a Data Audit, and have determined such questions as;

- How and why we hold data
- How long we will hold it for,
- How secure it is
- Our policies regarding sharing of data
- Our ability to comply with the six data processing principles
- The consideration of ‘Legitimate Interest’ with regard to our processes

3. Personal Data Explained

‘Personal Data’ refers to “any information relating to an identified or identifiable natural person (“Data Subject”)”.

This Privacy Statement serves to

- Tell you what Personal collects relating to you
- Tell you how Cowley Brown Recruitment uses, processes and discloses your Personal Data
- Tell you how Cowley Brown Recruitment protects your Personal Data against unauthorised or unlawful processing and against accidental loss, destruction or damage
- Tell you your rights as a “Data Subject”
- Tell you other important things to know

4. Collection and Use of Personal Data

Cowley Brown Recruitment will only collect, use or disclose Personal Data about an individual in accordance with the law, and will only gather, process, or share Personal Data with an individual’s consent.

By providing Cowley Brown Recruitment with your Personal Data, you are consenting to us:

- Gathering, storing and processing your Personal Data listed below for recruitment purposes as outlined in this Privacy Statement
- Disclosing your Personal Data to external parties as outlined in the Privacy Statement
- If in the past you have provided us with Personal Data (including your CV), and you no longer consent to our processing your Personal Data please email us at info@cowleybrown.com and we will promptly erase your Personal Data from our records.
- Personal Data collected/obtained by Cowley Brown Recruitment may include categories set out in the section below. Cowley Brown Recruitment collects your Personal Data through the following channels:
 - Job applications and enquiries (email, phone and online applications)
 - Phone conversations
 - Meetings

- Reference and background checks
- The Personal Data collected includes the following:
 - Name
 - Email address(es)
 - Phone number(s)
 - Areas of professional interest
 - Curriculum Vitae (CV) attachment
 - LinkedIn Profile - where you have an online public profile (for example LinkedIn), we may process the information available in conjunction with the information you provide directly to us.
 - Referral information - for any data about individuals other than yourself that you enter onto our website directly or include in any message to us, you are responsible for its accuracy and relevance and must have the authority of the relevant individual to disclose it to us, for the purposes of us providing recruitment services.
 - Additional Information (options to add additional information).
 - As a follow up to the submission of Personal Data via online (website or email), phone call, meeting or referral, we may collect additional Personal Data including, but not limited to the following, for the purposes of providing recruitment services:
 - Education and Qualifications
 - Remuneration Details
 - Notice Period
 - Details on Work Experience
 - Skill Sets
 - Interview notes of meetings with you in relation to your suitability for a specific role(s) and client requirements
 - Personal Public Service Number (PPS)
 - Limited Company Details
 - Photo Identification
 - Copy of Working Visa

Personal Data may also be collected from 3rd party sources, for verification and vetting purposes. Cowley Brown Recruitment will require you to provide consent before obtaining information from 3rd parties, and will notify you if seeking additional information. Examples include:

- Reference information (verbal and/or written)
- Opinions of others on work performance (example: references, feedback from employers or work colleagues on performance in positions or from professional associations or registration bodies)

This information will be passed to a prospective employer, normally at the stage of an offer of employment.

5. Personal Data Uses and Processes

Cowley Brown Recruitment is a specialist professional recruitment consultancy placing candidates on a permanent, contract and interim basis

Your Personal Data will be collected, stored and processed by Cowley Brown Recruitment to provide you with recruitment and/or related intermediary services, including:

- Matching your details against job vacancies
- Informing you of suitable job opportunities
- Submission of your details to client organisations, either in connection with a specific job or general employment with a client organisation (with your consent (verbal or written), as outlined in Paragraph 6 below)
- Enabling you to apply for specific positions with client companies

- Enabling you to revert to us on any job or market enquiries
- Sending you company newsletters and job alerts notifications. Company newsletters include an opt-out facility
- Marketing our recruitment services to you
- Keeping you aware of any relevant industry or company events, announcements, developments, competitions and promotions
- Communicating with you by phone, e-mail, social media, newsletter and other means for the purpose of providing recruitment services to you
- Informing you of market trends, and areas of possible employment opportunities
- For other purposes for which you have engaged with Cowley Brown Recruitment

6. Consent

By using the services of Cowley Brown Recruitment, your Personal Data as set out in Paragraph 3 above will be processed for the purposes set out in Paragraph 4 above on the basis of your consent. You have the right to withdraw your consent to Cowley Brown Recruitment processing your Personal Data at any time by notifying us in writing at any time on info@cowleybrown.com for the attention of Ken Cowley. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Cowley Brown Recruitment requires your Personal Data in order to provide the services outlined in Paragraph 4 above, if you do not consent to Cowley Brown Recruitment processing your Personal Data you cannot register with Cowley Brown Recruitment.

7. Disclosure of Personal Data

Cowley Brown Recruitment will not send your Personal Data to Clients without your consent (verbal or written). With your consent we may disclose your Personal Data to third parties, if they have a proper interest in the disclosure, such as:

- Potential employers or engagers, with the objective of finding a job for you, which may include position(s) which you may or may not have directly applied for.
- Organisations acting on behalf of our clients, involved in supporting their HR functions (for example: outsourced HR firms and outsourced reference / background checking firms).
- Cowley Brown Recruitment's internal advisors (for example: professional advisors, IT consultants involved in system upgrades or issues, outsourced email and marketing companies (example: professional company newsletter companies – managing distribution lists for the purpose of newsletters and mailshots).
- Third party contractor – If Cowley Brown Recruitment engages a third party contractor to perform services which involves handling or processing your Personal Data, we will ensure that they process your Personal Data in accordance with Cowley Brown Recruitment's data protection policies.

If the business structure of Cowley Brown Recruitment should change, for example in the event of a Sale, Merger or Joint Venture, your Personal Data may be disclosed to new or potential business owner(s) / business partner(s). In this event Cowley Brown Recruitment will ensure that such third parties only process your Personal Data in accordance with GDPR.

8. The Storage and Upkeep of Personal Data

Cowley Brown Recruitment will make reasonable efforts to keep your data accurate, current and up to date. Methods include phone calls, email, general communications staying in touch, and noting relevant changes you make to your LinkedIn Profile. We would ask that you let us know of any major changes directly and we will update our records accordingly.

We keep your Personal Data in the context of the services of a professional recruitment consultancy. If we have had no two-way communication with you for a period of 7 years, we will erase your Personal Data, unless requested otherwise by you. This is subject to the proviso that we may, at our

discretion erase your personal data at any time. As set out in 11 below, you have the right to instruct us to erase your Personal Data at any time.

9. Collection and Use of Technical Information

Our website has the potential to use two types of cookies; session and third-party. Visitors can use this website with no loss of functionality if cookies are disabled from the web browser. Cowley Brown Recruitment will make no attempt to identify individual visitors or to associate the technical details with any individual.

10. Data Security

Password protected data is stored both locally on our secure server (in Ireland) and in the cloud. Our systems are protected by up-to-date security measures including firewall and top of the range antivirus software to protect your data from unauthorised or unlawful processing and against accidental loss, destruction or damage.

11. Right of Access

You have the right to obtain from Cowley Brown Recruitment access to your personal data being processed by Cowley Brown Recruitment. You can do this by emailing info@cowleybrown.com for the attention of Ken Cowley.

This will be provided free of charge in accordance with GDPR. Where your access requests are manifestly unfounded or excessive, Cowley Brown Recruitment reserves the right to charge a reasonable fee taking into account the administrative costs of providing the information.

You have the right to have Cowley Brown Recruitment rectify any inaccurate Personal Data which Cowley Brown Recruitment holds relating to you.

12. Right to Erasure

Should you wish for your Personal Data to be erased from Cowley Brown Recruitment, you can email info@cowleybrown.com for the attention of Ken Cowley, providing your name, email and contact details asking for your information to be erased from our records.

13. Other Important Things to know

a. Clicking Submit, Applying or Registering

By entering details and clicking "Submit", "Apply", "Register", emailing or speaking to a company representative and providing the company with Personal Data, you are consenting to us processing your personal information set out in paragraph 3, in the manner and for the purposes outlined in paragraph 4 of this Privacy Statement.

b. Opt-out of Marketing Activity and Email Newsletters

Should you decide that you would prefer not to receive information on related services and related market activity, please use the unsubscribe link on the particular email or newsletter, or you may email info@cowleybrown.com requesting exclusion from such notifications

c. Links from our Website

Our website may contain links to other websites. Cowley Brown Recruitment has no control of websites outside the fkinternational.com and recentlyqualified.com domains. If you provide information to a website to which we link, we are not responsible for its protection and privacy policy, and cannot guarantee your protection.

Our website interfaces social media websites such as Facebook and Twitter and LinkedIn, and may use social media plugins (e.g., the Facebook "Like" button, "Share to Twitter" button or "Share on LinkedIn") to facilitate social media functions. The site also links to other websites of partners.

If you are a member of a social media platform or website, and log in to such social media or platform, the interfaces may allow the social media platform or website to connect your visit to our website to your Personal Data. The social media plugins also may allow the social media website to share information about your activities on our website with other users of their social media platform. We have no control over the information that other websites or social media websites or plugins collect, store, or use. Before you choose to access other websites from our website or “like” or “share” information from our website through any social media platform or website, please be certain that you review the privacy notice of that social media platform or website.

14. Further Information

For the purposes of the new General Data Protection Regulation (“GDPR”) effective May 2018 and the related legislation and regulations implementing these into Irish law from time to time (together “Data Protection Law”), the Data Controller is Cowley Brown Recruitment, of 8 Bank House, 331 South Circular Road, Dublin 8, Ireland

If you do not agree with this Privacy Statement you should not use our website and/or our services. If you have any questions about this Privacy Statement please email info@cowleybrown.com or write to: Ken Cowley, Cowley Brown Recruitment, 8 Bank House, 331 South Circular Road, Dublin 8

15. Complaints

If you are not satisfied with the manner in which we are processing your Personal Data, you have the right to make a complaint to the Office of the Data Protection Commissioner.

16. Changes to Privacy Statement

This Privacy Statement may be altered or updated by Cowley Brown Recruitment at any time, in which case we will display any such alterations or update on the Cowley Brown Recruitment website.