



Privacy Statement

Introduction

TalentPin is committed to protecting the privacy of our website visitors and customers. The purpose of this Privacy Notice is to outline how we collect and use any personal information about you (which is known as "personal data" under data protection legislation).

You have the right to object to us processing your personal data for direct marketing and also to processing which is carried out for the purposes of our legitimate interests. For more information, see the below Notice.

Change to Data Protection & GDPR

The law in relation to data protection is changing with effect from 25th May 2018. This Privacy Notice has been updated for new guests registering with effect from August 2018 to reflect your new rights and for existing customers to update how we process your personal data.

Read through this to fully understand the basis upon which we collect, use and store your personal data and to whom it is disclosed.

TalentPin will always keep your data safe and comply with applicable data protection legislation.

Who we are

TalentPin is wholly owned platform of Sigmar Recruitment Consultants Ltd. (Sigmar), 13 Hume Street, Dublin D02 F861, Ireland (Registered company number in Ireland: 353252).

The above lists the Owner, Operator and Data Controller (within the meaning of data protection laws applicable) of this website. References in this notice to "we" or "us" are to the above.

Data Subjects

This company has different categories of data subjects:

1. Data subjects who are general candidates looking for temporary or permanent work.
2. Data subjects who are engaged on a contract of employment by our company to be placed in temporary assignments in our client companies.
3. Data subjects who are our own internal employees carrying out the work of talent marketplace recruitment services.
4. Data subjects whom we introduce to companies and who provide contractual work to those companies
5. The personal data of those with whom we have contact in our client businesses

6. Personal data of suppliers who we may do business with.
7. Personal data for people whose details we receive from candidates and staff, such as referees and emergency contacts.

There are different categories of data required between the differing data subject categories and only the information necessary to conduct the contractual relationship and perform the contract unique to each data subject will be collected.

Your rights

By law, you have a number of rights when it comes to your personal data. Further information and advice about your rights can be obtained from the data protection regulator in your country (within Republic of Ireland, visit the Office of the Data Protection Commissioner).

Rights & Explanation

- to be informed

You have the right to know what personal data is being collected, our identity and your data protection rights (as per this Privacy Notice).

- subject access

You have the right to request and obtain access to your personal data

- to have inaccuracies corrected

If your personal data is inaccurate or incomplete, you have the right to have the data rectified, by the controller, without undue delay.

- to have information erased

This is also known as the 'right to be forgotten', you have the right to have your data erased, without undue delay.

- data portability

This right only applies where processing of personal data is carried out by automated means. You have rights to obtain and reuse your personal data for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.

- to object to direct marketing

You have the right to object to direct marketing processing (which we do only with your consent) of your personal data where the processing relates to direct marketing.

- to restrict the processing of your information, including automated decision-making

You have a limited right of restriction of processing of your personal data by a data controller. You have the right to not to be subject to a decision based solely on automated processing.

What Personal Data Do We Collect

We collect the personal data that you provide us during the registration & recruitment process, as well as any further personal data you provide to update your details from time to time. TalentPin is a talent marketplace platform displaying anonymised candidate profiles. Candidates registered with Sigmar may be profiled anonymously on TalentPin.

- Identity Data: name, an online username, title, date of birth and gender.
- Contact Data: address, email address and telephone numbers, social media links.
- Financial & Revenue Data: bank account details; PPS number; company registration details and any other tax-related information.
- Employment Data: This includes data that was provided to us through application for a role and/or assignment or employment: Details about your current remuneration, pensions and benefits entitlements; information on your interests and needs regarding future employment; Education details; immigration status (whether you need a work permit);
- Sensitive Personal Data: while we may not actively solicit it, on occasion you may share data with us on your racial or ethnic origin, biometric data, religious or philosophical beliefs, criminal convictions or the alleged commission of an offence or trade union membership;
- Website Data: internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website; information about how you use our website and services.
- Other: Additional information that you, the candidate, provide us with; additional information that referees provide us with; additional information that clients provide us with or that we collect from third party sources such as job sites; CCTV footage when you visit our premises.
- Client Data: Contact information; job titles; email correspondence; notes from meetings; signed copies of terms of business.
- Supplier Data: Contact information; email correspondence; notes from meetings; signed copies of terms of business; job titles.
- Referees and Emergency Contacts: Contact information supplied to us by candidates or internal Talent Pin staff.

Ensure Data is Accurate

It is vital that you inform TalentPin if your personal data changes so that we can ensure all the data we hold on you is accurate and up to date.

Other Information Collected

Like most websites, we also gather statistical and other analytical information collected on an aggregate basis from website visitors to our website. This data comprises information that cannot be used to identify or contact you, such as for example, user browser types and other anonymous statistical data involving the use of our website. We use this data in an aggregate form to get a

better understanding of where our visitors come from and to help us better design, organise and market our website. Should you have any queries regarding this data, please contact us at privacy@sigmar.ie.

How We Collect Personal Data

- **During Recruitment Process:** We may collect your personal data by speaking to you, by post, via email, via social media, when you leave a hard copy CV at our office; when you apply for a job on a job site and via CCTV capturing when you visit our offices.
- **While using our website:** we may collect data from you when you register on our website, or when you apply for a job. We may also use cookies and other technologies similar to this.
- **From 3rd Parties:** We may receive your personal data from 3rd parties including but not limited to, employers, referees, Revenue, credit agencies, MSP's and clients. When you 'like' Talent Pin's Facebook page or 'follow' Talent Pin on Twitter or other social media platforms we will receive your personal information from these sites.

Purpose/Activity	Legal Basis For TalentPin Processing Your Personal Data
To provide recruitment and job seeking services to you that you have requested in relation to a specific job or other suitable job opportunities in the future; this includes registering you as a candidate with Talent Pin, providing you with a contract where appropriate, informing you of potential job opportunities suitable to your background and sharing your CV and other pertinent employment related information with potential employers/hirers.	<ul style="list-style-type: none"> • Performance of a contract with you as you have entered into a work finding services agreement for the provision of talent marketplace recruitment services with TalentPin.
On occasion your details may be shared with clients to manage the recruitment process, or other third parties e.g. background checking companies in the delivery of our service who may in turn share your details outside the EEA.	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests (to solicit, evaluate and select applicants for employment) • Necessary to comply with a legal obligation
To manage Talent Pin's working relationship with you which may	<ul style="list-style-type: none"> • Performance of a contract with you

include keeping in touch with you in relation to recruitment or notifying you about changes to certain related processes or policies.	<ul style="list-style-type: none"> • Necessary to comply with a legal obligation • Necessary for our legitimate interests (to keep our records updated and accurate, to understand our candidates better and to provide excellent customer service)
To allow you to participate in a competition, prize draw, or complete a survey	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To ensure our website runs correctly as well as our IT business systems (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> • Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud) • Necessary to comply with a legal obligation
From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, Social media sites like LinkedIn, phone, fax or mail. We may use the information to customise our website per your interests and deliver relevant website content and advertisements to you	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to understand the different types of candidates within our business and what they need or want, to keep our website updated and relevant, to improve our business offering)
To allow you to submit your CV to Talent Pin, apply for jobs online or to subscribe to alerts about jobs which may suit your preferences.	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests (to solicit, evaluate and select applicants for employment)
We may contact you from time to time with information on events that we believe may be of interest to you.	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to develop our business as a recruitment provider)
For convenience, we may share your information with other consultants within the Sigmar Group.	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests (in the delivery of recruitment services)
To enable you to submit your CV, apply online for jobs or to subscribe to alerts about jobs	<ul style="list-style-type: none"> • Performance of a contract with you

which may align with your preferences.	
To allow Talent Pin to undertake payroll and invoicing functions	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with a legal obligation
To legally comply with obligations in connection with the detection of crime or suspected revenue fraud	<ul style="list-style-type: none"> • Necessary to comply with a legal obligation

Referee or Emergency Contacts:

We will contact referees using the personal information given to us by the candidate or internal TalentPin staff member to take up a reference as part of our due diligence during the recruitment process. We will contact emergency contacts using the personal information given to us by the candidate or internal TalentPin staff in case there is an emergency.

Client Data:

We use client data to assist us in the provision of our recruitment services and we store and process this data in the following way:

- contact details of clients so we can contact them regarding our recruitment services and to review their hiring needs;
- To take a detailed job specification regarding the client's specific requirements so that we know exactly what they are looking for and what candidates they want us to send them.
- emails and records of conversations and minutes of meetings regarding the recruitment service we may or may not provide the client;
- to keep in touch regarding how a recruitment process may be progressing
- to assist with the on-boarding of a candidate and any payment processes that may need to be discussed once the candidate has been placed with the client.
- contact information so we can inform clients of industry events that may interest them.
- Information collected from public sources or indirectly through a 3rd party or a website.

Supplier Data:

We use supplier data to assist us in the provision of our recruitment services and we store and process this data in the following way:

- contact details of suppliers so we can contact them regarding our business relationship;
- to satisfy certain legal obligations;

- to access customer service from the supplier.
- Information collected from public sources or indirectly through a 3rd party or a website.

Profiling:

TalentPin may display anonymous profiling, but does not employ fully automated decision making in the delivery of our services. Should this change in the future we will seek your explicit consent to this processing where appropriate.

Who We Share Your Data With:

TalentPin may share your personal with the following parties:

- To Potential Employers/Hirers to assist the candidate in finding a new role, including Master Service Providers (MSP's) and their clients when you have given us your permission to do so.
- 3rd Party Companies that provide reference and background checking services, medical checking companies etc when you have given us your permission to do so.
- To pension and healthcare providers for the provision of remuneration benefits.
- To our partner companies and any that we may merge with in the future to provide recruitment services to candidates and clients.
- Office of the Revenue Commissioners and other relevant Governmental bodies where we are legally obliged to.
- Referees, other recruitment consultancies; people or companies with information regarding a candidate's employment and educational history.
- Appropriate Processors such as IT, software and cloud storage providers as well as independent controllers providing professional services to Talent Pin.
- To analytics and search engine providers and platforms to optimise our website and online presence.

Disclosure

A necessity of our contractual engagement is that we share your personal data with our clients. We have in place Data Sharing Agreements (in the form of actual agreements or additional clauses within the terms and conditions of engagement between Talent Pin and our clients) or Data Processing Agreements with all such clients and have done our utmost to ensure that all such parties process your data in a manner that is consistent with this Privacy Notice and GDPR. Our clients may themselves be subject to third party audits either in the form of ethical audits, governmental/statutorily required audits or legal obligations, these are deemed a necessity of the contract of engagement between you and our company and on this legal basis your personal data will be shared to comply with these requirements.

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

How long we keep your personal data for

We will not keep your personal data for any purpose for longer than is necessary and we will only retain the relevant personal information that is necessary in relation to the purpose.

If you tell us, at any time, that you no longer want to have an account, then we will delete your personal data from our records.

We will process personal data during the duration of any contract and will continue to store only the personal data needed for periods after the contract has expired to meet any legal obligations. After these periods any personal data not needed will be deleted.

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

Cookies

What are cookies?

Cookies are very small text files which store very small amounts of information. They are used to remember settings and preferences between visits to the site, as well as information between different pages on the same site.

For security reasons, cookies can only be read by the site that set them. We have no access to cookies set on your computer by, for example, Google, Yahoo, Microsoft or any other website on the internet. However, through the use of third-party cookies, it is possible for sites to collect information about visitors to other sites. For example, online advertisers may use third party cookies to anonymously track an individual's visits to sites on the web.

More information about how we allow third party cookies on our sites is given below.

To find out more about cookies in general, you might find the following [link](#) useful.

How do we use cookies?

Currently, there are three types of cookies that may be generated as you browse our site: session cookies, preference cookies, analytics cookies.

1. Session Cookies

As you move through the site, various pieces of information need to be stored in order for the site to function properly. For example, if you perform a search for jobs, the search terms you use will be remembered so that you can change them later. If you log in, we will remember which account you logged in with.

This information is stored in a database and is referred to as a session. We set one cookie to keep track of which session you are using. Old session data is automatically deleted from our databases multiple times a day, so we do not store this information long-term.

In addition to the session cookie, we sometimes set a cookie to check if we can set cookies on your computer. This is done for diagnostic purposes when you use our contact form. We use this information to help solve any problems you may have encountered.

Please be aware that cookies are critical to the working of the site. If you choose to disable cookies from this site, you will not be able to log in and the functionality of the site will be greatly reduced.

2. Preference Cookies

Currently, we only set two types of preference cookie. One is set if you manually switch between mobile or desktop versions (e.g. view the desktop version of the site when on a mobile phone). Your choice will be stored in a cookie. The other is set when you click OK to signify that you have accepted cookies. If this cookie is set, we will not display the banner at the top of the page.

How do I control preference cookies?

These cookies are set as a direct result of your choice, and function solely as indicators of what that choice was. We do not believe they pose any risk to your privacy. However, you can always use your browser settings to control whether or not our site can set cookies on your computer.

Please be aware that cookies are critical to the working of the site. If you choose to disable cookies from this site, you will not be able to log in and the functionality of the site will be greatly reduced.

3. Analytics Cookies

In order to monitor how our sites are performing, we collect data about page visits. This information is completely anonymous — we cannot determine who it came from. When we use this data, we look at numbers of visitors overall rather than individual visits.

Analytics information is used in reports and to improve our site. For example, we have used analytics data to add, remove or change features of the site based on how popular they are with users.

We track, for example:

- the numbers of visitors to individual pages;
- when pages were visited;
- how long users stayed on the page;
- the page they came from;

- technical data about the device being used to browse the site (such as browser and operating system version, and display size) — we use this data to ensure that the technology our site uses is appropriate for the majority of our users, and how best to display the site for users who have less capable browsers.

More information about analytics cookies

We use Google to provide our analytics data. You can read more about how Google Analytics treats your data at [Google: Safeguarding your data](#).

You can also read [Google's full privacy policy](#).

How do I control analytics cookies?

Google provides a tool to opt-out of Google Analytics. This is available for all modern browsers in the form of a browser plugin.

Controlling cookies within your browser

A browser is a program you use to view web pages. Your browser allows you to control what cookies are set on your computer, and how long they are stored. You may have more than one browser installed on your computer. In this case, you will need to change the settings for each browser you use.

Browser help pages relating to cookie settings

Browser manufacturers provide help pages relating to cookie management in their products. Please see below for more information.

- [Internet Explorer](#)
- [Google Chrome](#)
- [Mozilla Firefox](#)
- [Safari \(Desktop\)](#)
- [Safari \(Mobile\)](#)
- [Android Browser](#)
- [Opera](#)
- [Opera Mobile](#)

For other browsers, please consult the documentation that your browser manufacturer provides.

How we contact you

Once you have signed up with Talent Pin, we may contact you by post, e-mail, SMS text messages, telephone or other means including other electronic means and social media applications, and only using such contact details as you provide to us from time to time.

If you no longer wish to receive such or certain communications, you can let us know by contacting us using one the privacy@sigmar.ie address. You may also update your preferred contact details from your account preferences after logging on to the website.

Making a request

We are required by law to act on requests and provide information free of charge, except where your requests are manifestly unfounded or excessive (in particular because of their repetitive nature) in which case we may charge a reasonable fee (taking into account the administrative costs of providing the information or communication, or taking the action requested), or refuse to act on the request.

Please consider your request responsibly before submitting it. We'll respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we will let you know.

Changes to This Notice

Any changes to this Privacy Notice will be posted on this website so you are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

Who can you speak to at Talent Pin about this Privacy Policy?

Questions, comments and the exercise of your rights regarding this Privacy Policy and your information are welcomed and should be addressed to the Data Protection Officer by email at privacy@sigmar.ie with subject "FAO Data Protection Officer" or by post at Data Protection Officer, Sigmar Recruitment Consultants Ltd., 13 Hume Street, Dublin D02 F861, Ireland.

If you wish to make a complaint on how we have handled your personal information, you can contact our Data Protection Officer, Hazel Skelton. If you are not satisfied with our response or believe we are processing your personal information not in accordance with the law you can complain to the supervisory authority in Ireland responsible for the implementation and enforcement data protection law: The Data Protection Commissioners Office. You have the right to complain to the DPC about our collection and use of your information. You can contact the DPC via their website – <https://www.dataprotection.ie/docs/Home/4.htm> or +353 57 8684800.