

## Inside Avenue General Data Protection Regulations Statement

Orchard Brook Holdings Inc. (USA), Inside Avenue Recruitment Ltd (UK) trading as Inside Avenue will hereby be known as "Inside Avenue".

Inside Avenue complies with applicable GDPR regulations as a data controller and processor as 25th May 2018. This is for both our candidates and clients.

Our position as a recruitment agency means Candidates give us control of their data. When there is a suitable role for a Candidate, we will get their express permission each time, to pass information on to the Client for the purpose of trying to get them a job through the normal interview processes.

Candidates are the data subjects, we are a data processor for candidates. We are a data controller to clients.

#### Your rights....

**The right to be informed:** This is about transparency. We're very open about the data we gather about you as a Candidate, or a Client.

- The Candidate information we take is contact information and 'normal' CV/ resume-type data in order to filter you as an option for our roles.
- The Client data we hold are contact details of people who are in charge of recruitment.

**The right to access:** The data we get is fully transparent. We do get some data from third party job-sites such as <u>Reed.co.uk</u>. or <u>Linkedin.com</u>. In addition we also obtain information from our social media networks and communication platforms such as Facebook, Instagram, WhatsApp and the like. This means that sometimes we will get Candidate data from them rather than the Candidate directly. In these cases, we contact the Candidate to ask

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for permission to work on their behalf. We will only ever have access to a CV / resume and are able to show this when requested.

The right to rectification: We are always happy to update information we hold to maintain as high an accuracy as possible.

**The right to erasure:** You have a right to be forgotten and we will do this on request. Please contact us on (UK) +44 203-744-9444 / (USA) +1 214 432 62 62, or email UK: privacy@insideavenue.co.uk / USA: privacy@inside-avenue.com to request this.

**The right to restrict processing:** If you would like us to stop using your data on your behalf to try and get you a new job we are more than happy to do this. Please contact us on (UK) +44 203-744-9444 / (USA) +1 214 432 62 62, or email UK: privacy@insideavenue.co.uk / USA: privacy@inside-avenue.com to request this.

**The right to data portability:** We are able to give you digital copies of any of the data we hold on you. Once requested we will work quickly to create a PDF of the information held and transfer it over. Please contact us on (UK) +44 203-744-9444 / (USA) +1 214 432 62 62, or email UK: privacy@insideavenue.co.uk / USA: privacy@inside-avenue.com to request this.

**The right to object:** If you decide that you would like us to stop using your data completely, please let us know and we will stop immediately Please contact us on (UK) +44 203-744-9444 / (USA) +1 214 432 62 62, or email UK: privacy@insideavenue.co.uk / USA: privacy@inside-avenue.com to request this.

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### Email Marketing...

Apart from sending Candidate CV and personal details over to Clients after express permission, we also send CV writing and job interview help and advice emails, but only when a Candidate is actively looking for a role. This is as noted on our internal systems.

These are considered marketing emails and are opted-into rather than opted out of. Initial permission is taken when you register and can be changed at any time, either by asking us or clicking the "Opt-out" link on an email.

#### SMS...

Sometimes we use SMS text messaging to let you know we have tried to call you. Although we do not consider these marketing, but rather contact information, you can opt-out of these also. Contact us directly or reply **STOP** as noted in the message.

### **Questions & Complaints...**

If you have any questions or complaints regarding GDPR, or any other part of the business, Please contact us on (UK) +44 203-744-9444 / (USA) +1 214 432 62 62, or email UK: privacy@insideavenue.co.uk / USA: privacy@insideavenue.com to request this.