

## **Privacy Policy**

### **1. Introduction**

1.1 This Privacy Policy clarifies our treatment of your personal data. This Policy outlines how we collect, use and process your personal data and how, in doing, so we observe our legal obligations towards you. We do care about your privacy and promise to safeguard your rights to data confidentiality.

1.2 This Privacy Policy is applicable to the personal data of Website Users, Candidates, Clients, Suppliers and any other individuals or institutions that we contact to obtain more information about our Candidates.

#### **1.3 Therefore, please be advised that:**

**The controller of the personal data in our database is Simply Talented Spółka z ograniczoną odpowiedzialnością based in Kraków, ul. Sadka 18, 30-690 Kraków, Poland, VAT number 9442272881**

### **2. What kind of personal data do we collect?**

2.1 **Candidate's data:** We need to process certain information about you so as to provide you with the best possible employment opportunities tailored to your needs. You are requested to provide only the data that we believe will truly allow us to support you, such as your first and last name, age, contact details, educational background, employment history, emergency contacts, immigration status, financial information and national insurance number (and you can obviously choose to give us other relevant details). In addition, we will collect some of your data as you use our website or click on any links in emails we send you.

2.2 **Client's data:** If you are a client of Simply Talented, we need to collect and use information about you or people within your organisation when providing or offering such services to identify Candidates suitable for you or your organisation. Your data will be processed also for marketing and commercial purposes so that we can sell you recruitment services from Simply Talented.

2.3 **Website User's data:** We collect only a limited range of data from our website users with a view to enhancing your user experience on our website and making it easier to manage the services we provide. This includes such information as how you use our website, how often you access our website and when our website is most popular.

Some of your personal data that we collect are required for us to be able to meet our contractual obligations towards you or others. If you refuse to provide us with such personal data or request us to discontinue the processing of such data, we may not be able to fulfil our contractual requirements or, in extreme cases, to continue our relationship or cooperation, depending on the type of personal data and the reasons for which we process them.

### **3. What are your rights?**

3.1 Simply Talented is fully respectful of your rights. Please be advised, then, that you are free to contact us directly at any time and to exercise the following rights: the right to access your data, the right to have your data rectified and erased, the right to object, the right to transfer your data to another controller, the right to restrict the processing of your data and the right to withdraw your consent, except that the withdrawal of your consent will be without prejudice to the lawfulness of the processing based on that consent prior to its withdrawal. Providing consent is voluntary, and you may withdraw your consent at any time.

3.2 The Controller has appointed a Data Protection Officer (DPO), whom you can contact at the postal address of the Controller's registered office or by e-mail at [info@wearesimplytalented.com](mailto:info@wearesimplytalented.com), on all issues related to the processing of your personal data and the exercise of your rights with respect to personal data processing:

**3.3** Keeping your data secure is our top priority; if, however, you believe that our processing of your personal data may violate the GDPR, you may lodge a complaint with the President of the Personal Data Protection Office.

#### **4. How do we use your personal data?**

**4.1 Candidate's data:** Our primary reason for using your personal data is to provide you with assistance in finding a job. Indeed, the more information we have about you, your skills and capabilities, the better we can customise our service to suit your needs.

**4.2 Client's data:** Our primary motive for using information about our Clients is to be able to demonstrate and make sure that it is possible for the contractual arrangements between us to be properly implemented for a smooth collaboration. Data will be processed in agreements/contracts/accounting documents signed with clients, in sales talks and in ongoing recruitment projects.

**4.3 Website User's data:** We use your data with a view to improving your user experience on our website, for example by examining your most recent job search criteria, to be able to show job offers that we think are of interest to you.

#### **5. With whom do we share your personal data?**

**5.1 Candidate's data:** We will make your personal data available to different entities, in different ways and for different reasons. Most importantly, we will provide your information to potential employers for the purpose of increasing your chances of finding a new job.

**5.2 Client's data:** We will make your data available to potential candidates with whom we are conducting recruitments for the purpose of having an adequate pool of candidates, to our employees, to entities with whom we cooperate in running recruitment projects, as well as to legal/accounting entities.

**5.3 Website User's data:** We may share information about you with providers of website statistics analysis services, marketing automation platforms and social media websites, for the purpose of making sure that any advertising you receive from us is selected for you, except where you decide otherwise.

#### **6. How long do we keep your personal data?**

**6.1 If you are a Candidate,** and we have had no contact with you for two years, we will erase your personal data from our systems except where we are required to retain your data by law or other regulations (for instance, for obligations towards tax authorities or in connection with any anticipated legal proceedings).

**6.2 If you are a Client,** we will keep your personal data so that we can deliver services to you or accept services from you, or to share any information about our services that we think may be of interest to you. Where you make it explicitly clear that you do not give your consent for us to retain your personal data, we will erase your personal data from our systems except where we are required to retain your data by law or other regulations (for instance, for obligations towards tax authorities or in connection with any anticipated legal proceedings).

#### **7. How can you access, correct or withdraw the personal data you have provided to us?**

Even if we already have your personal data, you still enjoy a number of rights associated with such data.

**7.1 Right to object:** Where we use your data for what we consider necessary to serve our legitimate interests, but you disagree with this, you have the right to object.

- 7.2 **Right to withdraw consent:** Having given your consent to have your personal data processed for specific activities or to be subject to marketing/commercial/recruitment activities, you are free to withdraw your consent at any time.
- 7.3 **Right to erasure:** You have the right to request that your personal data be erased in certain situations.
- 7.4 **Right to data portability:** You are free to transfer your data from us to another data controller at your discretion. We will help you with this, either by directly transferring your data for you or by giving you a copy in a common machine-processable format.
- 7.5 **Right to lodge a complaint with the supervisory authority:** You also have the right to lodge a complaint with the local supervisory authority.
- 7.6 Should your interests or requirements change, you may choose to unsubscribe from some or all of our marketing content (for instance, emails with notifications or Simply Talented newsletters, where we send them).

## 8. What are cookies and how do we use them?

- 8.1 A “**cookie**” is a small string of data stored on your computer's hard drive. In fact, virtually all websites use cookies with no harm to your system. We use them for the purpose of tracking your activity so that we can provide you with the most efficient experience possible when you are visiting our website. We may use information from cookies to make sure that during your next visit you are offered options tailored to your preferences. We may use cookies also for web traffic tracking and advertising purposes.
- 8.2 You can usually check or change the types of cookies accepted in your browser settings if you wish to do so. We also make this known on our Simply Talented [cookies policy](#) subpage.

## 9. How to reject cookies?

- 9.1 Should you prefer not to receive cookies that are not absolutely necessary for the basic functionality of our website, you may choose not to give your consent by changing your browser settings accordingly.
- 9.2 While most web browsers accept cookies, if you prefer us not to collect your data in this way, you may choose to accept all or part of cookies or reject them in your browser's privacy settings. If you reject all cookies, however, you may not be able to fully use all the features of our website. Please note that every browser is different. In order to learn how to change your cookie settings, consult the “Help” menu in your browser.
- 9.3 For further information about cookies and instructions on how to disable them, go to [aboutcookies.org](#). There, you will also learn how to delete cookies from your computer.

## 10. What data do we collect?

- 10.1 **Candidate's data:** We will collect some or all of the information listed below, depending on the circumstances and applicable laws and requirements, with a view to providing you with employment opportunities matching your circumstances and requirements, i.e. in particular the following details:
  - a) first and last name;
  - b) age/date of birth;
  - c) gender;
  - d) photography;
  - e) marital status;
  - f) contact details;
  - g) educational background;
  - h) employment history;
  - i) reference contact details;

- j) immigration status (where a work permit is required);
- k) nationality/citizenship/place of birth;
- l) date of start of work or availability;
- m) copy of driving licence or passport/ID card;
- n) bank details;
- o) financial information (where we need to verify your financial status);
- p) social insurance number (or any national equivalent) and other tax details;
- q) diversity details (racial or ethnic origin, religion or any other similar beliefs, mental or physical health, including information on disability);
- r) criminal record information, if required for the job you wish to apply for;
- s) details of previous and current remuneration, as well as retirement, disability and employee benefits;
- t) information about childcare or custody (e.g. when you give instructions to deduct payments for childcare vouchers from your remuneration or when you provide such information);
- u) sexual orientation (e.g. when you disclose such information by providing the details of your life partner);
- v) information about your interests and needs regarding future employment, collected directly and indirectly, for instance based on the job offers you view or the articles you read on our website or the links included in the emails we send you;
- w) any additional information you decide to give us;
- x) additional details that your reference contacts decide to provide us with;
- y) IP address;
- z) the dates, times and frequency of your uses of our website.

The list of categories of personal data we may collect set out above is not exhaustive. In addition, we will collect some of your data as you use our website or click on any links in emails we send you.

**10.2 Client's data:** In fact, we collect very limited customer data. What we usually need is your contact details or the contact details of those in your organisation (such as their first and last names, telephone numbers and email addresses) to be able to contact you regarding our services, to make sure our relationship is working smoothly and, if appropriate, to provide services to your employees. We also collect your address and accounting data such as your tax identification number for the purpose of settling accounts with clients. We may also hold additional information from someone in your organisation. In addition, we will collect some of your data as you use our website or click on any links in emails we send you.

**10.3 Website User's data:** We collect only a limited range of data from our website users with a view to enhancing your user experience on our website and making it easier to manage the services we provide. Such data include information on your way and frequency of using our website, the type of your browser, the location from which you view our website, the language you have chosen and the times of day when our website is most popular.

## 11. How do we use your personal data?

**11.1 Candidate's data:** As a general rule, we use Candidate data for the following four purposes:

- a) recruitment activities;
- b) marketing activities;
- c) activities for the establishment, exercise or defence of legal claims;
- d) profiling.

**11.2 Client's data:** We generally use Clients' data for the following four purposes:

- a) commercial activities related to the sale of our services;
- b) marketing activities;
- c) legal activities, including entering into and performing contracts;
- d) accounting activities, settlement of contracts.

### **11.3 Recruitment activities**

11.3.1 The main focus of our business is, needless to say, recruitment. We match the right Candidates with the right jobs in order for our Clients to hire them. Below you will find a list of the different ways in which your personal data are used and processed for this purpose, where appropriate and as prescribed by local laws and requirements. Please bear in mind that this list is not exhaustive and covers in particular activities such as:

- a) Collecting your data obtained from you and from other sources, such as: LinkedIn, job websites, other platforms, social media;
- b) Storing your data in our database in order for us to be able to contact you about the recruitment process;
- c) Delivering our recruitment services and enhancing the recruitment process;
- d) Evaluating data about you in terms of jobs we deem suitable for you;
- e) Providing information about you to our Clients in order to enable you to apply for jobs offered by the Clients or to assess your qualifications;
- f) Making it possible for you to submit your CV, apply for jobs online or subscribe to alerts for jobs we think may be of interest to you;
- g) Fulfilling our obligations under any contracts we have concluded;
- h) Conducting customer satisfaction surveys;
- i) Verifying any data or information requests you have provided (such as references, qualifications and a criminal record where needed, to the extent that this is relevant and consistent with local laws).

### **11.4 Marketing/commercial activities**

11.4.1 From time to time we will send you news that we believe may interest you or request your assistance in connecting other candidates with corresponding job offers. We will need your data in particular for the purposes stated below, where appropriate and consistent with local laws and requirements. Please bear in mind that this list is not exhaustive and covers in particular activities such as:

- a) Making it possible for us to develop and market other products and services from Simply Talented;
- b) Selling the full range of our recruitment services offered by Simply Talented as well as acquiring new clients and contracts;
- c) Sending you details of reports, promotions, offers, networking and events from Clients, along with general information about sectors that we think may be of interest to you;
- d) Sending promotional/marketing materials to individuals and entities in order to sell Simply Talented's recruitment services.

### **11.5 Activities for the establishment, exercise or defence of legal claims**

11.5.1 We may use your personal data in rarer cases to get support in establishing, exercising or defending legal claims.

### **11.6 Profiling**

11.6.1 Profiling refers to a type of data processing where we use the personal data we collect about you for the purpose of creating your profile. This allows us to have a better understanding of who you are and what you are interested in, what you like and dislike, so that we can offer you the best possible service.

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## I. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

We will share your personal data, where appropriate and consistent with local laws and requirements, in a variety of ways and for a variety of reasons, with entities in the following categories:

- a) Authorised staff of Simply Talented;
- b) **For Employees referred to work:** The Client you are going to work for, for whom the recruitment project has been conducted;
- c) **For Employees referred to work for a specific client and specific relevant cases:** healthcare professionals, e.g. your GP or occupational health specialist;
- d) **For Temporary Employees:** to potential employers (e.g. by providing references in cases permitted under local laws and requirements);
- e) Individuals and organisations holding information relating to your preferences or your application for employment with us, such as current, future or potential employers, educational institutions and examination bodies, as well as employment and placement agencies;
- f) Tax, audit and other bodies where we believe in good faith that the law or other regulations require us to make such data available (for instance, at the request of a tax authority or in connection with any expected legal proceedings);
- g) Service providers (third parties or companies cooperating with us) that perform functions on our behalf (third party consultants, business partners and professional consultants such as lawyers, auditors and accountants, administrative staff, technical support staff and IT consultants testing and developing our business Technology Systems);
- h) Third-party IT service providers as part of outsourcing and document storage services where we have concluded an appropriate data processing agreement (or any similar security measure);
- i) Marketing technology platforms and providers;
- j) **For Candidates:** potential employers and other recruitment agencies/organisations, with a view to increasing your chances of finding a job;
- k) **For Candidates:** third party partners, job websites, job platforms, job search engines, cloud-based software and database providers where we deem this likely to improve the chances of finding the right job for you or to generally streamline the recruitment process;
- l) **For Candidates and reference contacts of our Candidates and future Personnel members:** third parties we have retained to provide services such as verifications references, qualifications and criminal records to the extent that such verifications are appropriate and compliant with local laws;
- m) **For Candidates and Candidates' reference contacts:** to internal and third party auditors working for our clients when it is our contractual or statutory obligation to provide them with such data where requested;
- n) **For Candidates:** third parties providing us with assistance by developing services and processes aimed at optimising the process of Candidate selection so as to enhance the quality and efficiency of the recruitment services;
- o) should Simply Talented merge or be acquired by another company in the future (or holds relevant talks about such a possibility), we may make your personal data available to the new (potential) owners of the company.
- p) **For Clients:** authorised employees of Simply Talented as persons in charge of the sale of our services or marketing activities;
- q) **For Clients:** third parties or companies cooperating with us that perform functions on our behalf (third party consultants, business partners and professional consultants such as lawyers, auditors and accountants, administrative staff, technical support staff and IT consultants testing and developing our business Technology Systems);

## II. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA – LEGITIMATE INTERESTS

This is where Article 6(1)(f) of the GDPR applies, under which we may process your data if it is “necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.”

We do not believe that any of the following activities is detrimental in any way; on the contrary, these activities help us to provide you with a better customised and more efficient service (e.g. applying profiling techniques for personalising our interactions and mutual communications), so everyone benefits! However, you have the right to object to our processing of your personal data on this basis. To find out how to do this, click [here](#).

#### **Candidate's data:**

- 1) We believe it reasonable to expect you, as a Candidate, not to have any objection to our collecting or otherwise using your personal information for the purpose of offering or delivering recruitment services to you, making this information available to potential employers and verifying your skills against our database of vacancies. Where there is a reasonable expectation that you will be employed, your potential employer is also likely to seek to verify the information that you have shared with us (for example, the results of psychometric or aptitude tests), or to confirm your references, qualifications or criminal record information to the extent that such verifications are adequate and consistent with local law. It is essential for us to perform these activities for the purpose of operating as a profitable company and supporting you and other Candidates in finding the job you deserve.
- 2) Our objective is to make sure you receive customised job recommendations and relevant articles to assist you in your efforts to find a job. Accordingly, we consider it legitimate for us to process your data and apply profiling techniques so as to make sure that we send you the most relevant content and search for the most fitting opportunities for you.
- 3) It is also our belief that by taking part in our specialised online training courses or by making use of some of our more interactive services, you may find it easier to find a job, if you have the time to do so. These are components of our company's range of services and help us to stand out in a competitive market; it is therefore our legitimate interest to use your data for this purpose.
- 4) We need to make sure that our business operates smoothly in order for us to continue providing services to Candidates like you. We must therefore also use your data for our internal administrative activities, such as payroll and invoicing, where appropriate.
- 5) We have our own legal obligations, which we need to fulfil for our legitimate interest! We will share your data in connection with criminal prosecution, tax collection and actual or anticipated legal proceedings if we deem it necessary in good faith.

#### **Details of a potential Candidate:**

It is reasonable for us to assume that if you have published your professional CV on a job website or on a social network specialising in professional contacts, you are looking for job opportunities and consequently you will not mind if we collect or otherwise use your personal data to decide whether we can offer or provide you with recruitment services and contact you about this.

#### **Client's data:**

We keep your personal data or the personal data of your organisation's contacts, along with records of our conversations, meetings, registered jobs and workplaces with a view to providing you with the best possible service. From time to time, we will request you to fill in a customer satisfaction survey. This is something we believe to be reasonable – we deem the aforementioned uses of your data as necessary for our legitimate interests as an organisation providing a variety of recruitment services to you. We will process your data also in order to clear a completed project with you and to be able to produce the relevant accounting documentation.

## Supplier's data

We use and store the data of individuals in our organisation for the purpose of improving our receipt of services from you as one of our Suppliers. In addition, we have your financial data in order to be able to pay you for your services. We deem all such actions essential as part of our legitimate interests as a recipient of your services.

### PERSONS WHOSE DATA WE RECEIVE FROM CANDIDATES AND PERSONNEL, SUCH AS REFERENCE AND EMERGENCY CONTACTS AND DEPENDANTS:

- 1) If our Candidate or future Personnel member has listed you as a reference contact, we will use your details to contact you for a reference. As this is part of our quality assurance process, we deem it essential to our legitimate interests as an organisation providing recruitment services and hiring staff.
- 2) If you are requested to provide references based on your professional experience with the Candidate and if we think you may be interested in being our client, we may also use your details to contact you about this.
- 3) If a Candidate or a member of Personnel has provided us with your details as an emergency contact, we will use these details to contact you should an accident or emergency occur. We are sure that you will agree that this is a vital aspect of our people-oriented organisation and is thus essential to our legitimate interests.

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### III. CONSENT

- 1) We are required under certain circumstances to seek your consent to process your personal data for specific activities. This consent will be given on an opt-in or soft opt-in basis, depending on exactly what we do with your information.
- 2) Article 4(11) of the GDPR stipulates that **consent** means "*any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her*". Simply put, this means that:
  - you need to give us your consent voluntarily, with no pressure of any kind from us on you;
  - you need to know what you give your consent to, so let us make sure we have provided you with sufficient information;
  - you need to be in control of which data processing activities you authorise and which you do not. We make such a more precise selection possible in our privacy settings centre; and
  - you need to take positive and affirmative action by granting us consent – we can provide a box to tick to ensure this requirement is met in a clear and unequivocal manner.

#### We will record any consent given to us in this way.

- 3) As mentioned previously, we will be able to rely on soft opt-in consent in some cases. We may offer you products or services associated with the recruitment services we provide you with, except where you opt out of receiving such communications.
- 4) Be advised that we comply with additional local laws and consent requirements for receiving marketing materials in some jurisdictions in which we operate. For more information on this, please contact us at [info@wearesimplytalented.com](mailto:info@wearesimplytalented.com).
- 5) As noted, you have the right to withdraw your consent to these activities, at any time. For details on how to do this, go [here](#).



#### IV. ESTABLISHMENT, EXERCISE OR DEFENCE OF LEGAL CLAIMS

- 1) At times we will need to process personal data and, where appropriate and in compliance with local laws and requirements, confidential personal data for the exercise or defence of legal claims. Article 9(2)(f) of the GDPR allows the above activities when *“processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.”*
- 2) For example, the aforementioned circumstances will arise when we require legal advice for legal proceedings or when the law demands that certain information be retained or disclosed as part of a legal process.

#### V. PERSONAL DATA PROCESSING IS AIMED AT FULFILLING OUR CONTRACTUAL OBLIGATIONS TOWARDS YOU, MAKING SURE THAT YOU DULY FULFIL YOUR CONTRACTUAL OBLIGATIONS TOWARDS US AND ALLOWING US TO FULFIL OUR OBLIGATIONS TOWARDS OTHERS.

- 1) This is based on Article 6(1)(b) of the GDPR, which applies if the processing of personal data *“is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.”*
- 2) We may use automated decision-making for the purpose of deciding for you based on your personal data. We will do this only when necessary to perform the contract concluded between us and you and one of our Clients or when required for the performance of activities needed prior to the conclusion of the contract. We will do so only if we have your up-to-date consent for the processing of your personal data.
- 3) We believe it is reasonable to assume that, as a Candidate, you are hoping to be hired for a new job and that, by making use of our services, you request us to do what is necessary to do so. This may include but is not limited to verifying whether you fulfil the specific requirements for the job. When more than one Candidate applies for a job, we may need to screen the qualifications of a large number of potential Candidates. This is why we may make use of automated decision-making, allowing us to reduce the number of Candidates by applying specific filters to this group of Candidates.
- 4) Keep in mind that some countries where we operate may process data on a different legal basis.

#### Transfer of personal data outside the EU

We do not directly transfer the personal data of contact persons outside the European Union. Should such a recruitment project emerge, we will notify you of this and your personal data will be processed on other legal grounds in force according to the jurisdiction of the country concerned. We will then consult you on a case by case basis and give you appropriate information as to how your personal data will be processed in another location outside the European Union.

#### GLOSSARY

- 1) **Candidate** – includes a person who is a candidate for any job offered or promoted by Simply Talented or persons who Simply Talented reasonably deems likely to be interested in applying for any job, including permanent, part-time and temporary employment and freelance jobs offered by Simply Talented's Clients (including persons who wish or are reasonably considered by Simply Talented to wish to work as Temporary Employees); and persons who have submitted their CV without reference to a specific job offer. Individual contractors, freelancers and employees working for suppliers or other third parties suggested for jobs with Simply Talented's Clients as part of offers from SMEs (small and medium-sized enterprises) or others will be treated for the purposes of this Privacy Policy as Candidates.
- 2) **Clients** – entities that are our clients and other persons to whom Simply Talented provides Services in the course of its business or who Simply Talented reasonably considers to have an interest in our Services.
- 3) **Erasure of data** – It is virtually impossible nowadays to guarantee that electronic data will

be permanently and irreversibly deleted. Furthermore, in certain situations, as explained in the Privacy Policy, we will be required by law or regulations, or for risk management reasons, to retain access to certain elements of your personal information. Nevertheless, we undertake to apply specific operational and systemic measures with a view to ensuring that your data are “out of use” when the required retention period for your personal data expires or when we receive a proper request from you to erase such data. What we mean by this is that while the data will be technically present in the archive system, we guarantee that they will not be readily accessible to any of our Operating Systems, processes or Personnel members. Only a very limited number of senior Personnel members (and only by way of exception), in very limited and specifically defined situation (and, again, by way of exception), will be able to restore your personal data so that they are accessible for inspection in these legitimate cases. Having obtained assurance that all legally required retention periods have expired (which, based on current objectives, should be after seven [7] years), we will take the additional and final step involving “hard erasure” to the effect that even this very limited number of senior Personnel will not be able to restore your personal data.

- 4) **General Data Protection Regulation (GDPR)** – a European Union legislative instrument designed to align European data protection laws. It came into force as of 25 May 2018 and any reference to it should be interpreted accordingly as covering any related national data protection legislation.
- 5) **Other persons we may contact** – may include emergency contacts and reference contacts of Simply Talented Candidates and Personnel. We will contact them solely under appropriate circumstances.
- 6) **Potential Candidates** – persons with whom Simply Talented has had no previous contact but who it reasonably deems to show an interest in our services and, in particular, whom it regards as suitable for the job for which Simply Talented is in search of candidates or which it is promoting, including permanent, temporary or part-time jobs, and “freelancers” at Simply Talented clients.
- 7) **Personnel** – includes both present and former employees, interns directly employed by Simply Talented (or anyone who has accepted a job offer), as well as certain other employees who perform or have performed services for the benefit of Simply Talented (although they do not qualify as employees). We also include Simply Talented employees engaged to work at Clients' sites under RPO contract terms.
- 8) **Suppliers** – the term is used to refer to partnerships and corporations, sole proprietorships and individuals such as independent contractors and freelancers who perform services for the benefit of Simply Talented. Simply Talented may, under certain circumstances, sub-contract the performance of services provided to its Clients to third party suppliers performing services on behalf of Simply Talented. Suppliers who are individual contractors, freelancers or employees of suppliers will be treated as Candidates for data protection purposes in this context. Please note in this context that Simply Talented requires Suppliers to provide their employees with the relevant parts of this Privacy Policy (namely the parts addressed to Candidates).
- 9) **Systems** – include telephone, computer, internet and Wi-Fi systems, software and websites, accounts or networks owned, controlled or used by Simply Talented and used for the transmission, initiation or receipt of communications or otherwise used by Simply Talented, including the software of the website for Candidates and CRM systems.
- 10) **Temporary Employment Relationship** – mean the contractual relationship with Temporary Employees when they are employed directly by us.
- 11) **Temporary Employees** – include a person employed by Simply Talented to perform temporary work for a Client. If you are a Temporary Employee, we will similarly continue to process your personal data as a Candidate throughout the duration of your Temporary Employment and beyond, as set out in this Privacy Policy.
- 12) **Website User** – any person accessing any Simply Talented website.