

GIBBSHYBRID 

Data Privacy Policy

2017

## Your Privacy Rights

Gibbs S3 Limited (Gibbs Hybrid) is committed to protecting the privacy of our consultants and third parties, and strives to provide a safe user experience. This Privacy Policy describes how we collect and use online data.

By working with Gibbs Hybrid, you agree to the collection, use and transfer of your personal data as described in this Privacy Policy.

If you do not want your information to be collected, used, and transferred as described by this policy, you may revoke your consent to our Privacy Policy. To revoke your consent, please contact your account manager who will pass your communication to us. If you revoke your consent, we will be required to terminate our contract with you.

Information collected on our sites and applications is stored in the United Kingdom; therefore, your information is subject to UK law only.

## Scope of this Policy

This policy applies to information we collect.

## Information We Collect

We collect information about you when you comply with our People Screening process and also during the initial phase of our relationship with you when we are putting you forward to any of our clients. We collect information directly from you set out in our People Screening forms, such as your contact information, CV, profile information and, as required, we may conduct a financial probity check. We are also required to carry out criminal background record checks, subject to applicable law. With regard to your sensitive personal information, we will only collect this provided that we have your explicit consent.

We collect information about you using our online portal NowWeComply. This is an interactive portal which allows you to upload information yourself. Our third party vendor, Autologyx, is responsible for managing the NowWeComply portal and acts as the data processor in this regard.

## How We Use Information

We use the information we collect to provide our services, respond to you, and foster a positive user experience.

By contracting with Gibbs Hybrid, you have consented for us to use your information in the following way:

to create a profile for you based on information that you have provided to us, information collected or imported from other sites or applications, or information provided to us by third parties such as your contacts or referees.

You may opt in for us to provide you with the following:

- provision of additional communications, information, newsletters and further job opportunities;
- information on products or services available from Gibbs Hybrid;
- disclosure of information to third parties to receive information about opportunities with other clients.

## How We Share Information

We may disclose information if legally required to do so, or at our discretion pursuant to a request from a governmental entity or if we believe, in good faith, after considering your privacy interests and other factors, that such action is necessary to: (a) meet legal requirements or comply with legal process; (b) protect our rights or property; (c) prevent a crime or protect national security; or (d) protect the personal safety of users or the public.

## Security

You are responsible for keeping your username and password secret for any online database that we use with you, for example ETZ or NowWeComply.

Gibbs Hybrid takes appropriate measures to secure your personal information from accidental loss and unauthorised access, use, alteration or disclosure.

## Changes to Privacy Policy

If we decide to materially change the substance of this Privacy Policy, we will, where required, contact you via the email address that you maintain in your profile. We will also post those changes through a prominent notice on the site.

## Contact Information

Your data is submitted to Gibbs S3 Limited and is hosted and stored in a database on our servers situated in the United Kingdom with our principal place of business at Cantium House Railway Approach Surrey SM6 0DZ. This is the legal entity that determines the purpose and manner of processing the information gathered by Gibbs Hybrid, and is the data controller of your personal data. If, at any time, you have questions or concerns about this Privacy Policy, please contact us using our Gibbs Hybrid' website or in writing at our principal place of business, addressing your letter to our Legal Team.

We will use reasonable efforts to promptly answer your question or resolve your problem.