

PRIVACY POLICY

Introduction:

- This Privacy policy explains what is done with personal data we collect. The data we collect is used in purposes of finding suitable employment for yourself, maintaining a professional relationship, provision of services, using the data provided by yourself while seeking assistance in relation to another candidate or client, or you are visiting our website primeresourcers.com
- This Privacy policy explains how data is collected, used and processed and how we comply legally to your privacy and private data collected.
- This Privacy policy covers the personal data collected from our Website users, Candidates, Clients, Suppliers or all other people we may contact who we may contact in relation to our candidates, or whom are indicated as emergency contacts. This applies to the people we may contact who are emergency contacts of our employees / contractors as well.
- **For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR"), the company responsible for your personal data ("Prime Resourcers" or "us") can be found [here](#).**
- It has to be pointed out that this Privacy Policy might be amended or updated periodically.
- If you object to any of the aspects of these policy, you have legal rights to object. Some of the aspects are described further in this document you have legal rights and, where relevant, we have described these as well.
- **This Privacy Policy applies in relevant countries throughout our international network. Different countries may approach data privacy in slightly different ways and so we also have country-specific parts to this Privacy Policy. You can find country-specific terms for your jurisdiction [here](#). This allows us to ensure that we're complying with all applicable data privacy protections, no matter where you are**

PERSONAL DATA WE COLLECT:

- **CANDIDATE DATA** – we process your private data in means of finding **best employment / contracting opportunities for yourself**, but not before you agree being processed for these roles. The info we gather from yourself, and process dutifully is as following : name, surname, age (date of birth), education, nationality, current location, employment history, desired wage, contact details skills or any other info needed to better qualify for a role. In certain cases, before employment or contracting services commence once successfully a role is procured, we may ask for details such as financial information, ID or passport copy or social security number. Detailed description of the info we may ask from yourself can be seen below.
- While accessing our Website, we also collect certain information from you as user which will be further elaborated below

- **CLIENT DATA** : If you or your organisation are a CLIENT of Prime Resourcers we collect your information, or the employees / contractors in your organisation in purposes of :
 - Selection, qualification and finding of the candidates suitable for the positions you are searching for
 - Provision of Manage Service Provider programme for your organisation (or yourself) or supporting a third/party in doing so
 - Provision of Recruitment Process Outsourcing services to your organisation (or yourself) or supporting a third-party in doing so
 - Provision of content deemed noteworthy by Prime Resourcers as benefit to your organisation or yourself (for example a list of our services)
 - Detailed description of the info we gather will be elaborated below
- **SUPPLIER DATA** – the info we collect about our supplier are as follows; personell contact details, bank details, or any information deemed by the Supplier (or Prime Resourcers) as noteworthy.
 - Detailed description of the info we gather will be elaborated below.
- **Data we receive from Candidates, Staff, Suppliers, Clients as refferees or emergency contacts**
 - Referee contact we collect to confirm the info given to us by Candidates as means of further confirmation of his skillset or validity of his claims (name, last name, contact details ie. Phone, e-mail)
 - Emergency contact we collects from perspective candidates as means of any needed communication if a candidate is not available or in need of any kind of assistance
- **WEBSITE USERS**
 - We gather a limited amount of information from our Website users which we further use to enhance the experience of users while visiting the site.
 - The info we gather is data such as; browser or device type, interaction on the website, the frequency of visits, country of origin and other statistics such as time spent on the site.
 - If interaction of the website is done via chat, form (CV consulting for example) or using the apply button or submitting a CV for a specific job position, we use this data as well for the purpose you agreed upon
 - These information gathered will be further elaborated below.

HOW DO WE COLLECT YOUR PERSONAL DATA

CANDIDATE DATA; we collect candidate data in multiple ways, but some of the primary are listed as below:

1. Personal data you, as a CANDIDATE give directly to us via means as: website submission of the CV, e-mail, phone, Social media or instant messaging etc.
 2. Personal data we receive from third-party sources such as Social Media (ie. LinkedIn), CV browsing engines, job search sites and portals or as referrals from other perspective CANDIDATES
 3. Personal data we collect automatically, ie. Website users.
- PERSONAL DATA YOU GIVE US DIRECTLY

To provide a services requested by yourself, we need private information to provide that service correctly and fairly to our CLIENT and CANDIDATE.

As stipulated above, there are multiple ways we are collecting your personal data:

1. Entering your details on Prime Resourcers website, or social media channels, such as submission of the CV, Cover letter or any other information classified as Private or through a registration process.
2. Leaving a hard copy of your CV via post, personal delivery to Prime Resourcers main office or branch, or leaving the copy to some of our STAFF
3. Emailing your CV to Prime Resourcers or being interviewed by some of our STAFF
4. Applying through a third-party software, website or Social Media community, including Social Media platforms
5. Submission through a Prime Resourcers affiliated partners or CLIENTS

- PERSONAL DATA WE RECEIVE FROM THRID-PARTY SOURCES

We receive personal data from third-party sources as well, be it looking for them actively through CV browsing platforms, social media, referrals from other prospective CANDIDATES, This all depend on applicable laws and requirements:

1. Your referees or referrals or CLIENTS may share private information about yourself
2. Our CLIENTS might share private information about you
3. We may obtain sensitive personal information about yourself from third-party sources from multiple channels ranging from Social Media, job sites, CV browsing platforms etc.
4. If your details are shared with us from a Managed Service Provider or Recruitment Process Outsourcing they shall be processed as well
5. If you are our follower on Social Media Channel, such as, but not limited to Facebook, LinkedIn, Instagram, we may obtain your personal data

- **PERSONAL DATA WE GATHER AUTOMATICALLY**

If you interact with our Website, or any other affiliated software, website or email, we may collect the relevant data from yourself. [Please see Cookie policy](#)

- **CLIENT DATA**

- Data submitted directly by you
- Data we receive from other sources
- Data we process and receive automatically

- **PERSONAL DATA WE RECEIVE DIRECTLY FROM YOU**

1. We receive the data directly from you, contacting us proactively (via email, phone, social media, website)
2. We contact you in means of securing, opening a B2B cooperation

- **PERSONAL DATA WE RECEIVE FROM THRID-PARTY SOURCES**

1. Analysis and market research, via means of both active online research and analysis, as well as other forms of media by other sources – thrid party business development agencies or similar
2. From lists of attendance at conferences and other events
3. From other sources, such as our CANDIDATES who want us to act as intermediaries between yourself and them.

- **PERSONAL DATA WE RECEIVE AUTOMATICALLY**

Prime Resourcers may collect sensitive private data from our website by means of using cookies such as Google Analytics and Google TAG manager which is being used now as a primary analytics tool. We may collect info such as IP adress, location, age, devices and browser type, page interaction, time spent on the website. We may collect and analyze data that is given to us via interaction with the website.

We may use the data collected automatically to increase the user experience on our and Prime Resourcers affiliated websites.

[To see more about the Cookies used – please see Cookie Policy](#)

HOW DO PRIME RESOURCERS USE YOUR PERSONAL DATA

Having obtained your personal information. Prime Resourcers use them in multiple ways, primary being for RECRUITMENT PROCESSES.

PRIME RESOURCERS USE CANDIDATE DATA IN ONE OF THE FOLLOWING WAYS

- Recruitment process and activities
- Marketing activities
- Legal claims

RECRUITMENT PROCESS AND ACTIVITIES:

Our main area of activity is recruitment. To connect prospective candidate with desired and right opportunities we may use the data for the following (not limited to)

- Collection of private info from yourself direct or other aggregators, social media platforms and similar
- Storage of details, such as CV, contact info, private photo or any other information received from yourself or other sources in our database. Prime resourcers uses third-party recruitment CRM to store, track the details of prospective candidates. We update your details with frequent contact and contact you in relation to other opportunities.
- Provision of recruitment services and establishment of recruitment process plan
- Analysis of your personal data in relation to other opportunities deemed a good fit for yourself
- Processing and supplying your data to our CLIENT for employment / contracting opportunities worldwide
- Submission of your CV to prospective CLIENTS for job purposes
- Subscribe to our marketing activities and creating job alert searches customly made for you depending on the data submitted
- Allowing you to participate in other services we may deliver
- To use your data in respect of any contractual obligations entered between US as a SERVICE PROVIDER or you as a CANDIDATE
- Payroll and invoicing stipulated in mutual contract
- Customer satisfaction surveys
- Verifications of details provided by yourself deemed relevant by Prime Resourcers for employment purposes or our CLIENT via third-party sourcers (ie. Checking past criminal convictions)
- Complying with our legal obligations in accordance with local law
- Processing your data to keep you informed about our products and services with a targeted approach

MARKETING ACTIVITIES

As stipulated above, we might use your personal info to send you custom targeted marketing efforts we deem as relevant for yourself, informing you about what Prime Resourcers thinks might be of interest to you as a CANDIDATE. We may use your data for the below purposes (but not limited to)

- Marketing of our Products and services
- Marketing of our full recruitment capabilities and Services which you may find of some interest (ie. Our RPO, MSP services, CV Consulting etc.)
- Reports, news etc. We may find of particular interest to you and your search for the right job
- If agreed, use your personal details as means of refereeing Prime Resourcers as a recruitment company and promoting your story for which you would be contacted by someone from our STAFF independently (note we do not use this without prior consent and discussion)
- Promotions by Prime Resourcers CLIENTS and SUPPLIERS

For some of the purposes above, we will need your additional consent as MARKETING ACTIVITIES are not our primary purpose, you can always withdraw your consent from these activities by contacting us on consent@primeresourcers.com

LEGAL CLAIMS:

- In extraordinary situations. We may use your data and the consent to this PRIVACY POLICY as a way to establish a legal claim that you were informed about the processing and analysis of your data by PRIME RESOURCERS or our CLIENT or any third party.

CLIENT DATA

How do PRIME RESOURCERS USE YOUR PERSONAL DATA

- Recruitment process and activities
- Marketing activities
- Legal claims

RECRUITMENT PROCESS AND ACTIVITIES

Our aim to you as a CLIENT is providing you with services such as RPO, MSP and full cycle recruitment process. We use your data as followed:

- Storage of your data in our Recruitment CRM and hardcopy, updating when applicable
- Using your data to contact you regarding recruitment or any other services agreed upon in a contract between yourself, CLIENT and us as a service provider

- Using the info you delegated or submitted to us for means of increasing your CUSTOMER SATISFACTION, targetted approach and conducting customer satisfaction survey
- Creating targetted marketing campaigns

We may use this data as we deem fit for our Legitimate interests.

MARKETING ACTIVITIES

- We will share with you are marketing promotions, newsletters etc. If we deem you might have benefit from it.
- We will not ask for prior consent, but if needed – you may withdraw from our MARKETING ACTIVITIES by sending a written notice on consent@primeresourcers.com

LEGAL CLAIMS

- In extraordinary situations, we may use your data and consent to this PRIVACY POLICY as means of establishing a LEGAL CLAIM

SUPPLIER DATA

We use your data for the following:

- To update your data on our database for mutual cooperation and any situation which is in direct relation with our mutual agreement
- To offer or receive services
- Targeting marketing campaigns, business development and similar
- Legal claims

PERSONAL DATA WE RECEIVE FROM THRID-PARTY SOURCES

We use your data for the following:

- Contact in case of emergency or any other action qualified as emergency
- We will contact you if you were submitted as a referee so you can validate the claim of the CANDIDATE OR CLIENT as a refferal
- We will contact you if we deem it fit with a job prospect or any other service deemed as valid.

WEBSITE USERS

We use your data for the following:

- Analysis of the search criteria, interaction with the website, or submission of the CV to present certain job opportunities or services that might be of some interest to you

WHO DO PRIME RESOURCERS SHARE YOUR PERSONAL DATA WITH:

Within local legal constraints, PRIME RESOURCERS might share you personal data with the following:

- Clients within our network, both CLIENTS with which we have a contract of cooperation signed, as well as perspective CLIENTS
- Organisations with which you have cooperated before or were a part of at some point, such as – past and present companies, institutions of education, examining bodies or other recruitment agencies
- Government institutions (such as; but not limited to) – TAX authorities, local police departments and similar.
- Third party Service providers which are in cooperation with PRIME RESOURCERS or are conducting services on behalf of PRIME RESOURCERS
- Third-party software providers which we work with to store, update and analyse your data.
- Marketing platforms and software (both third-party and custom made PRIME RESOURCERS software or platform)
- From CANDIDATE perspective, we share your data with: CLIENT (potential employer), or other recruitment agency, job boards or other platforms and aggregators, as well as affiliated PRIME RESOURCERS partners, MSP or RPOs

If PRIME RESOURCERS is sold, or changes in ownership structures, the data we process will be handed over to that other entity.

KEEPING DATA SAFE

We take good care of our CANDIDATES and CLIENTS data by using authorized and up to date software with regular third-party security analysis of our implemented solutions. If you believe any misuse of your data has happened – please contact support@primeresourcers.com

STORAGE OF DATA

We keep your data for a substantial time period until specifically requested by yourself- We will do periodical checks of your intent in staying in our database.

- We will delete your data if no specific contact has been made for substantial period of time or we do not longer see you as interested in cooperation
- Data received by third-party sources will be checked with that same provider, or if notified by them to remove you from our database
- If deletion of data request is sent to consent@primeresourcers.com

DELETION, AMENDS or RETRIEVAL OF DATA

One of the main objectives of GDPR is that a person can object, withdraw, amend or ask for their private data to be deleted from anyone even if the consent had been given before.

- For any request regarding your personal data – please contact us on consent@primeresourcers.com
- A person or organization (ie. CANDIDATE, CLIENT, SUPPLIER, WEBSITE USER) have a right to :
 1. RIGHT TO OBJECT ON PROCESS OF USING YOUR PERSONAL DATA – you can object to any of the activities described above by sending us an objection email on consent@primeresourcers.com
 2. RIGHT TO WITHDRAW CONSENT – you can withdraw your consent for any of the activities described in this PRIVACY POLICY by sending us a WITHDRAW CONSENT email on consent@primeresourcers.com
 3. DATA SUBJECT ACCESS REQUEST (DSAR) – at any time, you can ask us for info about the information or private data we hold about you at consent@primeresourcers.com

In accordance with the local law, we may reject your request in some jurisdictions.

4. RIGHT TO ERASURE; you may ask we erase your data but must meet one of the following criteria
 - The data are not necessary anymore for the purpose we collected the for; ie. Job search
 - Withdrawal of consent
 - The data was processed unlawfully; not in accordance with the GDPR
 - It is necessary for the data to be erased to comply with our legal obligations as a DATA CONTROLLER
 - If we process the data for reasons not deemed legitimate with this PRIVACY POLICY and cannot demonstrate legitimacy

We cannot comply with your request on one of the following ground:

- Exercising the right of freedom of expression and information
- Complying with legal jurisdictions, legal authorities or performing tasks of public significance
- Public health reasons
- Statistical or archival actions
- To exercise or defend legal claims

If submitted a valid request or deletion, we will do so within a month of the formal request and will make sure all the private data is deleted.

5. RIGHT TO RESTRICT PROCESSING

You have a right to restrict processing, which means we can store your PRIVATE DATA but not process it until one of the reasons below is addressed

- Disputing the accuracy of the data until it is verified
- If you object on our processing of your data on our legitimate interests
- When our processing of your data is considered illegitimate but you prefer not to have them erased

- When we do not need to process your data anymore but you need it for legal claim purposes
- If we shared your private data with third-parties, we will notify them to restrict processing when possible, and inform you once this restriction was cleared

6. RIGHT TO RECTIFICATION

- You have the right for rectification, that means if we hold any incorrect data about yourself, we should rectify them and inform any parties we shared you information with to rectify them as well when possible. We will try to share you the data to whom this invalid information has been shared with
- If not possible or plausible, we will explain the background on each individual case.

7. RIGHT OF DATA PORTABILITY

- You have a right to disclose your information or migrate it to another account, any information we have from you. We can migrate to another party
- To allow you to do so, we will give you your information in a readable format which is password protected
- This covers all the data received in either way we collected it.

8. RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

If you want to exercise any of these rights or have any further questions regarding them – you can contact us at consent@primeresoucers.com

WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA ON PRIMERESOURCES.COM?

- PRIME RESOURCES d.o.o

HOW DO WE STORE AND PROCESS YOUR DATA INTERNATIONALLY:

We process your data in one of the following manners:

- Between PRIME RESOURCES entities
- Third parties (ie. CLIENTS and SUPPLIERS)
- International CLIENTS
- Cloud based software or CRM used by PRIME RESOURCES
- CLIENTS within your country who may share them internationally

Outside of EU and EEA we will share your data in a safe and secure manner dependent on data protection laws of each of the respective countries.

