

## Privacy notice – website visitors

gap personnel holdings limited ('the Company') is a recruitment business which provides work-finding, recruitment, training and related services to its clients and work-seekers.

Within our group there are several subsidiaries including:

- gap Technical Limited
- Kickstart2employment
- Gatewen Training Services Limited
- Kerr Recruitment Limited
- Atkinson Page
- Global personnel group

Our parent company is BeNext Group Inc. which is a global human resources and staffing provider; BeNext Group Inc. 3F NBF Comodio Shiodome, 2-14-1 HigashiShimbashi, Minato-ku, Tokyo 105-0021.

The Company must process personal data so that it can provide these services – in doing so, the Company acts as a data controller. We will only use your personal data in accordance with the terms outlined in our contracts and our privacy notice.

### 1. Collection and use of personal data through the website

We may collect personal data on your visits to our website including, but not limited to, your IP address, browser, timestamp, content from surveys and contact forms and other communication data and the resources that you access. Our collection of this personal information will make your visit to the website easier in the future as we will be able to suggest content that is relevant to you based on the location you access the website from, what content you access and how you interact with it; At times this information may be utilised for our internal analysis of website performance.

We may use your personal information to send you direct marketing via email and other communication means when consent via selecting an opt-in for this purpose in the relevant contact form. You may opt-out of receiving future marketing communications at any time by clicking opt out on our marketing email.

No sensitive data is collected through our website.

#### 1.1 Contact form

we will collect any information you provide to us when you use our contact forms. If you contact us, we will keep a record of that correspondence. Fields we request include but are not limited to: your first name, last name, company name, job title, email address, telephone number, job details, industry, your location.

#### 1.2 Cookies

We may obtain data about you from cookies. These are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies also enable us to deliver more personalised content.

Our website uses cookies to distinguish you from other users of our website in order to provide increased functionality and service. Most web browsers allow some control of most cookies through the browser settings.

The table below explains the cookies we use and why.

Cookie	Name	Purpose
_utma, _utma, _utmc, _utmt, _utmz, _utmv, _utmz, _ga, _gid	Google Analytics	Tracking movements of users on website to generate statistics.
consultant	gap personnel consultant	Allows gap personnel consultants to login and post vacancies to the website
__atssc	AddThis	Used to manage the share count, until the sharing cache is updated.
__unam	ShareThis	Monitors "click-stream" activity, e.g. web pages viewed and navigated, and time spent on pages
zlcmid	Zopim Chat	Used to interact with Zopim Live Chat facility

### 1.3 Log files

We use IP addresses to analyse trends, administer the site, track users' movements, and to gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

### 1.4 Purpose of processing and legal basis

We rely upon legitimate interest when processing your personal data collected through:

- a) the website cookies to provide you with a better experience, but also help to us improve our website and services.
- b) when you provide your data over our on-line contact form for the purposes of work-finding, recruitment, training and related services.

We rely upon your consent to use your data for purpose of direct marketing. You have the right to withdraw that consent at any time by clicking unsubscribe on our marketing email or by emailing Data Protection Officer [dpo@gap-personnel.com](mailto:dpo@gap-personnel.com)

### 1.5 Recipient/s of data

Where we need to share your personal, we have contracts and data sharing agreements in place with the recipients that require them to treat your information as confidential and ensure the continued protection of your data whilst in their possession.

The Company will process your personal data, with the following recipients:

- a) Our parent company BeNext Group Inc. and any of our group companies:
  - gap Technical Limited
  - Kickstart2employment
  - Gatewen Training Services Limited
  - Kerr Recruitment Limited
  - Atkinson Page
  - Global personnel group
- b) Governing bodies and authorities as required by law;
- c) Our software providers;
- d) Third party suppliers, e.g. business associates and professional advisers, such as external consultants, technical and IT support functions, independent auditors;
- e) Marketing technology platforms and suppliers, e.g. Google Analytics
- f) We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or a part of any business restructuring or reorganisation. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

## 2. Overseas transfers

The Company may transfer the information you provide to us to countries outside the European Economic Area ('EEA'). The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

The most common reason for this is since our parent company BeNext Group Inc. is based in Japan. Whenever your data is shared with BeNext Group Inc. it is done so through our UK based secure SharePoint system.

Whenever your data is shared, inside or outside of the EEA, we will take every step possible to ensure adequate protections are in place to ensure the security of your information.

## 3. Data access restriction and retention

Data submitted via online contact form will be archived after 2 years, and kept for future 5 years with restricted access to it.

Should you being provided with our services please see relevant Privacy Notice for data retention schedule. After expiry of that period your data will no longer be kept by gap personnel.

Where the Company has obtained your consent to process your personal data we will do so until you withdraw it, otherwise it will be kept in line with the schedule detailed in relevant Privacy Notice were services have been provided.

## 4. Data security

For information on data security when data are provided via online contact form please see relevant Privacy Notice.

## 5. Automated decision making

The company does not use automated decision-making, including profiling. Should the company intend to change this process you will be notified in advance.

## 6. Automated decision making

The Company's website may contain links to other external websites. Please be aware that the Company is not responsible for the privacy practices of such other sites. When you leave our site we encourage you to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by the Company's website.

## 7. Changes to this privacy statement

We will update this privacy statement from time to time. We will post any changes on the statement with revision dates. If we make any material changes, we will notify you.

## 8. Your rights

Please be aware that you have the following data protection rights:

- a) The right to be informed about the personal data the Company processes on you;
- b) The right of access to the personal data the Company processes on you;
- c) The right to rectification of your personal data;
- d) The right to erasure of your personal data in certain circumstances;
- e) The right to restrict processing of your personal data;
- f) The right to data portability in certain circumstances;
- g) The right to object to the processing of your personal data that was based on a public or legitimate interest;
- h) The right not to be subjected to automated decision making and profiling; and
- i) The right to withdraw consent at any time.

Where you have consented to the Company processing your personal data and sensitive personal data you have the right to withdraw that consent at any time by completing on-line request ([click here](#)) or emailing Data Protection Officer [dpo@gap-personnel.com](mailto:dpo@gap-personnel.com)

## 9. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: Data Protection Officer by emailing [dpo@gap-personnel.com](mailto:dpo@gap-personnel.com)

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/> or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.