PRIVACY POLICY

Information Regarding Yoh’s Privacy Practices:

This document describes Yoh’s policy regarding information received about you during visits to our web site. The amount and type of information received depends on how you use our site.

**Normal Web Site Usage:**

You can visit Yoh's web site to read product and company information without telling us who you are and without revealing any personal information. The only information we collect and store during normal web site usage is the name of your Internet service provider, the web site that referred you to us, the pages you request and the date and time of those requests. We use this information to generate statistics and measure site activity to improve the usefulness of customer visits. During normal web site usage we do not collect or store personally identifiable information such as name, mailing address, email address, phone number or social security number.

**Candidate Privacy Notice:**

If you providing personally identifiable information as a candidate for employment at Yoh, please review Yoh’s Candidate Privacy Notice here.

**Collection of personally identifiable information:**

There are instances where we might request personally identifiable information to provide the web site visitor a service or correspondence (promotions and mailed brochures). This information, such as name, mailing address, email address, type of request and possibly additional information, is collected and stored in a manner appropriate to the nature of the data and is used to fulfill your request. If you tell us that the information should not be used as a basis for further contact, we will respect your request. The information you provide is used by Yoh to improve the services we provide you. It is never provided to any other company for that company's independent use.

**Yoh's Internet services:**

To use Yoh's Internet Services, such as On-Line Requests, we require a certain amount of personally identifying information (examples are: name, address, zip code, business name, etc.) that we can use to verify you as a Yoh customer (or to meet with your request). We use this information to identify and access data in the existing relationship we have with you to provide you with the requested services. We request electronic mail addresses (email) as an alternate means of contacting you. Providing your email address is optional.

**Electronic Mail sent to us that contains personal information:**

Internet users may decide to send Yoh personally identifying information, for example, in a message containing information about your Yoh product or service. Yoh will only use this information to identify the user as a Yoh customer and to determine how to respond to the electronic mail. We will not use this information other than to resolve the matter identified in the email. We reserve the right to change our Privacy Policy. A revised Privacy Policy will only apply to data collected subsequent to its effective date. Any revisions will be posted at least 10 days prior to its effective date.

**Copyright Notice:**

Copyright © 2019 Yoh Services LLC. All rights reserved. All text, images, graphics, animation, videos, music, sounds and other materials on this site are subject to the copyrights and other intellectual property rights of Yoh, its affiliated companies and its licensors. Yoh owns the copyrights in the selection, coordination and arrangement of the materials on this site. These materials may not be copied for commercial use or distribution, nor may these materials be modified or reposted to other sites.

**EU DATA PRIVACY NOTICE & POLICY**

Yoh Solutions Ltd is committed to protecting and respecting your privacy and personal data.

We are Yoh Solutions Ltd, of First Floor 1000 Eskdale Road, Winnersh Triangle, Wokingham, RG41 5TS and we can be contacted regarding this privacy policy at DPOGlobal@yoh.com. Yoh Solutions Ltd is registered with the Information Commissioner’s Office under the company registration 4585332 as ICO reference ZA365474.

**SCOPE OF POLICY**

This policy sets out the basis on which any personal data we collect from you, or that is provided to us by third parties such as job boards or LinkedIn and will be used and processed by us. In particular, we explain the kinds of personal information that we collect from you, how we collect it, what we use it for and who we may share your personal information with.

By “personal information” we mean information about you where you are, or could be, identified.

**OUR OBLIGATIONS TO YOU**

Yoh Solutions Ltd is required to process your personal data in accordance with the law.

We have to comply with the Data Protection Act no 2472/1999, Law no 3471/2006 and from 25 May 2018 the General Data Protection Regulation (EU) 2016/679 (“GDPR”) when keeping personal data about you when we obtain, use, disclose or otherwise process such data.

This privacy policy complies with the DPA and has been updated to comply with the GDPR.

**WHO IS THE DATA CONTROLLER FOR YOH SOLUTIONS LTD?**

Any personal information processed by Yoh Solutions Ltd is controlled by us and so we are considered the data controller of your personal information. Yoh Services LLC will act as joint Data controllers or processors and who are based in the United States of America and perform IT, system administration services and business leadership to Yoh Solutions Ltd.

A data controller is a person or persons who determine the purposes for which and means by which personal data is processed.

**WHO IS THE DATA PROTECTION OFFICER FOR YOH SOLUTIONS LTD?**

Our nominated data protection officer (DPO) for the purpose of the regulations is Phil Long.

The DPO is responsible for monitoring compliance with GDPR. You have the right to contact the ICO [www.ico.org.uk](https://www.yoh.com/www.ico.org.uk), the UK’s data protection supervisory authority at any time with your concerns or contact the DPO directly in the first instance at DPOGlobal@yoh.com. You may also raise your concerns at [https://dayzim.alertline.com](https://dayzim.alertline.com/).

**WHAT INFORMATION DOES YOH SOLUTIONS LTD COLLECT AND PROCESS ABOUT YOU**

To assist you in locating employment, contract assignments or temporary work, Yoh Solutions Ltd will process personal data, such as name, postal address, email address, and landline or mobile telephone number.

We may also collect technical information including Internet Protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site, (including date and time); what you viewed or searched for.

If relevant we may also collect data and hold data such as details about previous employment including work references, training and qualifications for work seekers. Further to this if we find you suitable assignments we will require information including bank details, proof of your right to work in the UK and any other information as required to enable us to make payments and are in line with current UK employment regulations or for the purposes of entering into a contract with you.

The personal data we collect from you may include information that you provide to us directly or through companies or agents we work with, as well as information which we collect when you use our services.

**HOW DOES YOH SOLUTIONS LTD COLLECT THIS PERSONAL DATA?**

We collect personal information about you whenever you register with us, use our services or when you use our websites.

**Information that you give us:**

Personal data is that which you provide to us by filling in forms on our website, or by corresponding with us by telephone, email, post, and social media or otherwise.

This personal data would relate to applications for a particular role, allowing us to match suitable assignments for as long as you require. We will process your email address to provide you with remittances, payment advices and any alerts regarding work opportunities and positions we feel will suit your skills and requirements. If you are successful in your application for an assignment we will process your bank details, and in some instances national insurance number, and statutory tax details in order to fulfil the legal requirements under the HMRC RTI regulations whilst in a relevant assignment.

**Information we receive from other sources:**

This is personal data that we receive about you from others. As a recruitment business Yoh Solutions Ltd works with third parties to advertise roles and source candidates. We collect identity and contact data from publicly availably sources such as LinkedIn and various job boards which may be based inside or outside of the EU. We also co-operate with and report to government bodies such as HMRC to ensure we are meeting our statutory obligations.

**Information we collect when visiting our website:**

In line with information security standards we monitor website behaviour through website analytics. We collect information about how each visitor uses our website. These are then used to compile reports and to help us improve our site.

As you interact with our website, we may automatically collect technical information about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive technical Data about you if you visit other websites employing our cookies.

In some instances, we also collect, use and share aggregated data. Aggregated Data may be obtained from your personal data but is not considered personal data as this does not directly or indirectly reveal your identity. In the event that we combine or connect aggregated data with your personal data we will treat the combined data as personal data, which will be used in accordance with this privacy policy.

By using our website we do not collect any “Special Categories of Personal Data” about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

**WHAT PURPOSE DOES YOH COLLECT AND USE YOUR PERSONAL DATA?**

Yoh will process your personal data to conduct our business and to provide you with the best possible service.

We also use your personal data to:

* provide advice and professional services as an employment agency, to maintain our own records and to support and manage our own employees;
* provide you with update and alerts, such as interview confirmations, feedback and offers and changes to our privacy policy;
* monitor our own work and maintain our records;
* administer and improve our website and other communications with you including the use of analytics;
* enable compliance with statutory and legal obligations;
* detect and prevent fraud;
* respond to any complaint you might make;
* contact you in an emergency; and
* answer general enquiries you might make.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. If we use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. We will consider and balance any potential impact on you (both positive and negative) before we process your personal data. Please contact us if you need more details at DPOGlobal@yoh.com.

Yoh will not process your personal data

* To sell it to a third party

The provision of your personal data is a legal requirement to allow us to prove your identity and to make payments or statutory deductions: Without your personal data it may be difficult or impossible for us to fulfil our legal obligations to you which would affect our ability to provide services. So, for example, if you refuse to provide us with your name, address and contact details in an application for a position, it will not be possible to provide offers or local interviews.

**LEGAL BASIS FOR COLLECTING PERSONAL DATA**

We are able to legally collect and use your personal information either because:

* you have provided us with your consent to do so as explained above; and/or
* collecting and using your personal information is necessary for us to carry out our legitimate business interests in order to carry out any requests or orders made by you via our Website.

You can tell us to stop collecting and using your personal information at any time by emailing us at PrivacyRequest@yoh.com.

If you tell us to stop collecting and using your personal information, the consequence of doing so is that we may not be able to assist you in locating employment, contract assignments or temporary work.

**COOKIES ON THE YOH WEBSITE**

Like most websites, our website uses cookies to distinguish you from other users. A cookie is a small file which is placed on your computer's hard drive. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to your needs. Overall, cookies help us provide you with a better website because we can monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. Some cookies are essential for the operation of our website. If you disable or refuse cookies some parts of our website may become inaccessible or not function properly. You can find out more about cookies by following this link: https://ico.org.uk/for-the-public/online/cookies/.

**LINKS TO OTHER WEBSITES AND SERVICES**

Our website may also include links to other external websites, plug-ins or applications maintained by a third party (“Linked Sites”) that may collect and share personal data about you. We provide Linked Sites to you solely as a convenience, and the inclusion of Linked Sites does not imply endorsement by us of the Linked Sites. You access Linked Sites at your own risk and by accessing them you leave our website. These websites are not controlled by Yoh Solutions Ltd and we are not responsible for the contents of any Linked Site, including the privacy policies or tracking technologies they may use. We encourage you to read the privacy notice for every website you visit.

**WHEN DOES YOH DISCLOSE PERSONAL DATA?**

We may also disclose your personal information to a third party when you ask us to do so or when we believe it is required by law.

We sometimes need to share personal information we process with the individual themselves and also with other organisations or other service providers that provide support services to Yoh Solutions Ltd. Where this is necessary we are required to comply with all aspects of GDPR. What follows is a description of the organisations we may need to share some of your personal information with, for one or more reasons.

* financial organisations;
* current, past or prospective employers;
* suppliers and service providers acting as processors in the United Kingdom, in the EEA or United States of America; central government;
* credit reference agencies;
* debt collection and tracing agencies;
* business associates;
* complainants and enquirers;
* professional advisers and consultants including lawyers, bankers, auditors and insurers, some of these are based in the EEA or United States of America; and
* as might be required by law, including compliance with any court order or legal obligation in the United Kingdom, EEA or United States of America.

When entering into any agreements that involve the sharing or disclosure of personal data Yoh Solutions Ltd requires that these third parties comply with General Data Protection Regulations and information security policies or have substantial policies of their own in place.

We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

**WHERE DOES YOH SOLUTIONS LTD STORE YOUR PERSONAL DATA?**

Yoh Solutions Ltd has put in place appropriate technical and security measures to prevent accidental loss, damage or destruction of your personal data, and to protect your personal data against unauthorised, or unlawful use or theft.

We have strict confidentiality agreements, including data protection obligations, with data processors and third-party service providers. They will only process your personal data on our instructions. Access to personal data is limited to employees, agents, contractors and other third parties who have a legitimate business need to know.

Where you undertake an assignment, temporary work or are employed by Yoh, some of your personal information will involve transferring your data outside the European Economic Area (EEA).

Many of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

* we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission;
* where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe; and
* where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

For more information, see [European Commission: Model contracts for the transfer of personal data to third countries](https://ec.europa.eu/info/strategy/justice-and-fundamental-rights/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)or [European Commission: EU-US Privacy Shield](https://ec.europa.eu/info/strategy/justice-and-fundamental-rights/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en)or DPOGlopal@yoh.com if you want further information on the specific mechanism used by us when transferring your personal data outside of the EEA.

**FOR HOW LONG WILL YOU USE MY PERSONAL DATA?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, or as required by law. In some circumstances we may anonymise your personal data so that it can no longer be associated with you for research or statistical purposes where we may retain it indefinitely.

**WHAT ARE YOUR RIGHTS?**

GDPR provides you with a number of rights in relation to your personal data. These include rights to rectification or erasure of your personal data, and to restrict or object to its processing. You have the right to:

* be informed about the personal information we collect from you and use, which this privacy policy seeks to do;
* obtain confirmation from us that your personal information is being collected and used by us and to access the personal information held about you by us;
* have your personal information corrected if it is inaccurate or incomplete at any time;
* erasure, or the right to be forgotten, which means you can request deletion or removal of any personal information we hold about you at any time;
* block or suppress us collecting and using your personal information, which means we can continue to store your personal information but we cannot further collect or use it in any way;
* obtain and reuse any personal information we hold about you for your own purposes across different services, which allows you to move, copy or transfer your personal information easily from Aegean Airlines to another place notified by you to us in a safe and secure way without hindrance to the usability of your personal information; and
* object to us collecting or using your personal information where this is based on:
	+ a legitimate interest or the performance of a task in the public interest; or
	+ direct marketing.

To make any requests as listed above, please contact us at PrivacyRequest@yoh.com.

We will confirm any requests relating to your rights above within one month of receipt of your request, or within two months of receipt of your request where this request is more complex.

**YOUR INFORMATION, YOUR CHOICE**

To update us with your information-sharing preferences, you may contact us at PrivacyRequest@yoh.com.

**SECURITY**

We shall implement appropriate technical and organisational measures to ensure a level of security appropriate to potential risks, including:

* the pseudonymisation and encryption of your personal information where appropriate;
* ensuring ongoing confidentiality, integrity, availability and resilience of processing systems and services;
* ensuring we can restore access to personal information in a timely manner if a physical or technical incident occurs; and
* regular testing, assessment and evaluation of the effectiveness of our technical and organisational measures to ensure your personal information is secure.

We maintain physical, electronic and procedural safeguards to protect the confidentiality and security of personal information transmitted to us using our Website.

**CHILDREN’S PRIVACY**

We do not knowingly collect any information from anyone under 16 years of age. Our website, products and services are all directed to people who are at least 16 years old or older.

If you are under 16, do not use or provide any information on this website or on or through any of its features/register on the website, make any purchases through the website or provide any information about yourself to us, including your name, address, telephone number or email address.

If we learn we have collected or received personal information from a child under 16, we will delete that information.

If you believe we might have any information from or about a child under 16, please contact us at DPOGlobal@yoh.com.

**BUSINESS TRANSITIONS**

As we continue to develop our business, we may undergo a business transition such as acquiring another company, merging with an existing company, or selling a portion of our assets. In such transitions, customer information is typically one of the business assets that is transferred or acquired by a third party. In the unlikely event that Yoh Solutions Ltd or substantially all of its assets are acquired or enter a court proceeding, you acknowledge that such transfers may occur and that your personal information can continue to be used as set forth in this privacy policy.

**CHANGES TO OUR PRIVACY POLICY**

This policy replaces all previous disclosures we may have provided you about our information practices. We reserve the right to change this policy, and to apply any changes to information previously collected, as permitted by law. If there are material changes to this policy or our information practices change in the future, we will notify you by posting the policy changes on our website.

**THIRD-PARTY MARKETING**

We will get your express opt-in consent before we share your personal data with any company outside the Yoh group of companies for marketing purposes.

**MAKING A COMPLAINT**

We pride ourselves on excellent customer service, but if you would like to make a complaint about the way we have collected or used your personal information, please contact us at DPOGlobal@yoh.com or [https://dayzim.alertline.com](https://dayzim.alertline.com/).

If you are unhappy about the way we have handled your complaint and/or you would like to take the matter further or make a complaint directly to our regulator without contacting us first, you can do so by contacting the Information Commissioner’s Office (“ICO”) by following this link: <https://ico.org.uk/concerns/> or telephoning the ICO helpline, which is 0303 123 11