

## **Privacy Policy**

## Who we are

We are ICE Group. We consist of a number of related companies – ICE Group Business Services, KT Business Skills, ICE Workforce and Cokealla.

## What we do

We offer varied and flexible recruitment and HR services to clients.

We also provide and manage business and vocational training services for the clients [corporate, public and individual]

We provide business services both insourced and outsourced in payroll, project management, sales management, financial management and ICT management.

#### Consent

By providing us with your information you are indicating your consent for <u>ICE Group</u> to collect and process your personal details in the following manner:

## The information we collect and how we use it

We process data in order to perform our <u>business services</u>, and to take steps at your request prior to providing a service and to comply with our legal and regulatory obligations and for the purposes of our legitimate interests.

Types of people whose data we process	
Recruitment Candidates	Learners /Students /Trainees
Clients / Employers / Host Companies	Suppliers
Staff	Other People whose data is provided to us by one of the other categories e.g. Referees and Emergency Contacts
Agency Workers	

Recruitment Candidate Data and Agency Worker Data

We invite you to share personal information with us by uploading it through our websites for example through the "Upload your CV" pages

This information [CV] will normally include your name, address, phone numbers, email address and work history, training and education details and any other information you have chosen to include.

We use this information to provide our <u>recruitment services</u>, answer your enquiry and provide supplementary services.

We will use your information to match you with jobs we or clients may have.

During our recruitment processes we may seek further personal information as appropriate including – proof of identity, educational certification and/or permission to contact your education provider to confirm educational achievements, proof of permission to work in the jurisdiction, your current or past remuneration, pension and benefit details, extra information you choose to tell us, extra information that our Clients may tell us about you, aptitude and skill testing information, physical and mental health information, your IP address, the dates times and frequency with which



you access our services and CCTV footage if you attend our premises, or a web based interview. This list is non-exhaustive. We may also invite you to undertake some testing.

We will send some of your personal information to the client.

We will also ask you to provide personal details on other people – your referees, so get their permission, inform them that we will contact them. We require Referees contact details – their name, job title, organisation, work email, phone number so that we can contact them to ask for information they already have about you.

If you are unable to provide the information requested by us, it will affect your employment prospects.

As an Agency Worker we will also keep data related to your employment as an Agency Worker through us.

## Supplier Data

We use and store the personal data of individuals within your organisation [or you as an individual] in order to facilitate the receipt services and goods from you as one of our Suppliers. This includes financial information so that we can pay you and keep the necessary financial records.

Other People whose data is provided to us by one of the other categories e.g. Referees and Emergency Contacts

- If your information has been provided as a Referee by a prospective or actual Recruitment Candidate, Agency Worker, Learner /Student /Trainee, member of Staff, we will use your personal data in order to contact you and obtain a reference.
  This is part of our quality system and so we deem it to be necessary for our legitimate interests.
- If your information has been provided as a Emergency Contact by a prospective or actual Recruitment Candidate, Agency Worker, Learner /Student /Trainee, member of Staff, we will use your personal data in order to contact you in the case of an accident or emergency. This is part of our quality system and so we deem it to be necessary for our legitimate interests.

#### Learners /Students /Trainees Data

We invite you to provide information to allow us to take steps at your request [or your organisations] prior to providing a training service and to provide the training and associated activities e.g. examination and certification.

This information will normally include your name, address, phone numbers, email address and work history, training and education details and any other information you have chosen to include. It may also include your PPS Number, Course/Programme, Attendance Record, Certification Results, Training Registration Identifier, Training Location, Financial details relating to Allowances or Benefits, as identified by the appropriate Funding, Certification or Awarding organisation or your employer, and CCTV footage if you attend our premises. We will also keep financial details related to your payments history. We keep a photo of all Learners /Students /Trainees.

### Clients / Employers / Host Companies

To ensure we meet your expectations of our quality service delivery we store your personal data and/or the personal data of individual contacts at your organisation as well as keeping records of our conversations, meetings, communications, transactions and agreements. From time to time, we may also ask you to participate in other activities, which we believe will benefit your organisation or

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your people. We deem these uses of your data to be necessary for our legitimate interests as an organisation providing our services to you.

#### Staff

During the hiring process we the Recruitment Candidate Data section outlines the data processes. During your employment, we continue to keep the information previously provided and update it as you work with us. We will also keep information on your attendance and performance.

### Other Data sources

You may have provided information to other public data sources that we may also process. An example would be where you have posted professional or educational information online, public registers, other service providers etc.

## Sharing your information

We will only share your information with as appropriate

- Our clients, where it is an agreed part of our service
- Prospective employers to assist them in their hiring processes.
- Individuals and organisations who hold information related to your reference or application to work with us, this includes past employers, educational establishments and examining/awarding bodies, employment agencies.
- Tax, audit or other regulatory authorities that we have a legal obligation to share information with.
- Third party outsourced IT and data management providers where we have appropriate processing agreements or protections in place
- Outsourced service providers, where they are contracted to provide services to us and have agreed to meet our stringent data protection contractual requirements.
- Clients overseas [outside the EU] only where you specifically have expressed an interest in working in another country.
- If we merge with or are acquired by another business, we may share personal information with the new owners of the business and their advisers. You will be sent notice of such an event should it occur.

We may disclose or share your data in order to comply with any legal obligation or in order to enforce or apply our Terms of Business.

## Subject Data Access Request

It is important that we have up to date information about you, your career and educational accomplishments. You have the right to

- ✓ Confirm the information we hold
- ✓ Modify the information,
- ✓ update it or
- √ <u>delete</u> it [to request <u>delete</u> you must email <u>gdpr@icegroup.ie</u>]

to comply, we will ask you verify your identity, or ask for more information about your request. In some circumstances where we are legally permitted to do so we may decline your request and we will explain why.

Please note that we will not provide the following types of information in response to a data access request: Information about other people; Opinions given in confidence; Repeat requests or



privileged information. Other types of information may also be exempt under data protection laws (e.g. data relating to the commission of offences or estimates of damages).

## Opt out

If you no longer wish to be registered with us, you can let us know at any time.

Send an email to <a href="mailtogdpr@icegroup.ie">gdpr@icegroup.ie</a> and we will remove your details.

## Job Alerts and Relevant News

We endeavour to keep in touch with you via email and social media. We will send you 'career and job information. This will be in the format of 'job alerts', 'career events' and 'career and training information'.

If you decide that you do not want to receive these please email <a href="mailto:nomorenews@icegroup.ie">nomorenews@icegroup.ie</a> or click unsubscribe link on information we sent.



## Statement for CV upload on icejobs.ie

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## Other information we may collect and how we use it

At a Job offer [employment stage] of the recruitment process we may also seek dependent on the Employers requirements – a photograph, your PPSN [or equivalent country Tax /Social security Number], your personal Bank account information, a copy of your driving licence and /or passport / identity card, diversity information and marital status, emergency contact details. Such information forms part of an employment record. If you cannot provide it in a timely manner, your job offer will not proceed.

## Sharing your information

We will only share your information with

- Prospective employers to assist them in their hiring processes.
- Individuals and organisations (which may be international) who hold information related to your reference or application to work with us, this includes past employers, educational establishments and examining/awarding bodies, employment agencies.
- Tax, audit or other regulatory authorities that we have a legal obligation to share information with.
- Third party outsourced IT and data management providers where we have appropriate processing agreements or protections in place
- Outsourced service providers, where they are contracted to provide services to us and have agreed to meet our stringent data protection contractual requirements.
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