

# Koda Staff

# Privacy Notice

## About this Privacy Notice

This privacy notice regarding the processing of personal data (hereinafter “**Notice**”) explains what personal data Koda Staff Limited (hereinafter “**Koda Staff**”, “**we**”, “**us**” and/or “**our**”) may process about you, what we do with it and why, and how you can exercise your rights in connection with it.

In this Notice, “**you**” refers to an individual being a (potential) candidate or job seeker (for internal job opportunities or for job opportunities through our recruitment service), a (contact person of a) client, vendor, service provider or supplier, any individual with whom we have a business relationship with or a visitor/user of our website or office locations.

For the purposes of the processing activities set out in this Notice, Koda Staff shall qualify as the “**controller**” in relation to the processing of your personal data. This is a legal term – it means that we make decisions about how and why we process your personal data. As a data controller (but even in case we would qualify as a data processor), we will process personal data in accordance with the applicable data protection legislation, in particular with the provisions of the EU General Data Protection Regulation (“**EU GDPR**”) for data subjects in the European Union; and the UK General Data Protection Regulation (“**UK GDPR**”) and the UK Data Protection Act 2018 (“**DPA**”) for data subjects in the UK.

In this Notice, when we talk about “**personal data**” we mean any information that relates to an identified or identifiable natural person by which we can identify you, including information such as name, address, contact details, details relating to your professional and work eligibility information, etc.

The term “**process**” means any activity relating to personal data, including, by way of example, collection, storage, use, consultation and transmission.

## What types of personal data do we collect and where do we get it from?

[The table below sets out the types of personal data we might process and where we might collect it from]

Category	Types Of Personal Data	Collected From
Data relating to your identity/contact details	<ul style="list-style-type: none"> <li>• First name, Last name</li> <li>• Postal address</li> <li>• E-mail address</li> <li>• ID information and documents</li> <li>• Telephone number (private or professional)</li> <li>• Place and date of birth</li> <li>• Nationality</li> <li>• Company details (e.g. employer, role (and/or job title), place of work,...)</li> </ul>	<ul style="list-style-type: none"> <li>• You (e.g. when you contact us by e-mail, telephone, social media, at an event, fill in the contact form on our website,...)</li> </ul>

	<ul style="list-style-type: none"> <li>Your signature</li> </ul>	
<b>For recruitment Professional suitability and eligibility information</b>	<ul style="list-style-type: none"> <li>Resume or CV</li> <li>Cover letter</li> <li>Professional experiences</li> <li>Educational experiences (including university degrees/diplomas, academic records, certifications, awards and achievements,...)</li> <li>Financial information (e.g. current salary and other benefits, such as retirement plans, life and medical insurances, paid time off, ...)</li> <li>Language proficiencies</li> <li>Information relating to your right to work (e.g. citizenship/residence Information,...)</li> <li>Volunteer work</li> <li>Hobbies and interests</li> <li>Information regarding your application</li> <li>Information regarding any employment background checks we make to verify the provided information</li> <li>Test results (if any)</li> <li>Criminal records (if we are legally allowed to request such information)</li> </ul>	<ul style="list-style-type: none"> <li>You (e.g. when you contact us by e-mail, telephone, social media, at an event, fill in a contact form on our website, from interviews, ...)</li> <li>Third parties (e.g. your references from your professional or educational history, previous employers, professional network websites (such as LinkedIn), social media platforms and websites, recruitment platforms, licensed services, news sources (such as industry publications), third-party providers for employment background checks.</li> </ul>
<b>For recruitment Career criteria, preferences and expectations, Payroll administration/ other financial data</b>	<ul style="list-style-type: none"> <li>Career criteria, preferences and expectations</li> <li>Desired salary and other benefits</li> <li>Desired location to work and willingness to relocate</li> <li>Family information</li> <li>National identification number</li> <li>Seniority</li> <li>Bank account number</li> </ul>	<ul style="list-style-type: none"> <li>You (e.g. when we conduct an interview with you to check your career preferences)</li> </ul>
<b>Demographic/sensitive personal data</b>	<ul style="list-style-type: none"> <li>Race</li> <li>Gender</li> <li>National origin</li> <li>Disability status</li> <li>Occupational health and safety information</li> <li>Marital status</li> </ul> <p>We only collect demographic data in case we are required to or permitted to do so by legal obligations and in support of equal opportunity affirmative or monitoring programs (e.g. adjusting work arrangements to guarantee inclusion).</p>	<ul style="list-style-type: none"> <li>You</li> <li>Your emergency contact(s)</li> </ul>
<b>Communication data</b>	<ul style="list-style-type: none"> <li>Data from your interactions with us, your (business) interests, etc.</li> </ul>	<ul style="list-style-type: none"> <li>You</li> </ul>
<b>Photographs, visual images and video recordings</b>	<ul style="list-style-type: none"> <li>Photographs</li> <li>Images from video recordings</li> <li>Images from our security cameras</li> </ul>	<ul style="list-style-type: none"> <li>You (e.g. when you conduct a video conference with us, when you visit one of our offices)</li> <li>Third parties (e.g. professional network platforms (such as LinkedIn), website from your previous company,...)</li> </ul>
<b>Marketing and communication data</b>	<ul style="list-style-type: none"> <li>Marketing preferences</li> <li>Communication preferences</li> </ul>	<ul style="list-style-type: none"> <li>You</li> <li>Third parties (e.g. professional network websites (such as</li> </ul>

	<ul style="list-style-type: none"> <li>• Content of the interactions with us (e.g. feedback on our services both as a client as a candidate)</li> <li>• Technical details of the interactions with us (e.g. with whom you communicate, the date, the time, etc.)</li> <li>• Your business interests (for our clients, vendors, suppliers and other service providers)</li> </ul>	LinkedIn), social media platforms and websites, recruitment platforms, licensed services, news sources (such as industry publications),...
<b>Technical data, browsing and usage information</b>	<ul style="list-style-type: none"> <li>• Internet Protocol (IP) address</li> <li>• Browser plug-in types and versions</li> <li>• Geographical location of your electronic device</li> <li>• Operating system</li> <li>• Login data</li> <li>• Time zone setting</li> <li>• Information automatically generated through your use of our website, including Cookies</li> </ul>	<ul style="list-style-type: none"> <li>• You (automatically via your use of our website and other platforms such as Twitter, Instagram and LinkedIn)</li> </ul>

### What are the grounds for processing your personal data?

We might use the following grounds as a lawful basis to process your personal data:

- **Contractual obligation:** Processing your personal data is necessary in order for us to enter into a contract with you and/or to implement a contract;
- **Legal obligation:** Processing your personal data is necessary for us to (i) comply with our legal and regulatory obligations or (ii) respond to any reasonable requests from competent law enforcement agencies or representatives, courts and public bodies or organizations, including competent data protection authorities;
- **Legitimate interests:** Processing your personal is necessary for our legitimate interests or those of third parties. If the processing activity does not outweigh any risks to your rights and freedoms, we will refrain from processing your personal data for our own business purposes;
- **Consent:** You have given permission for us to process your personal data. The consent will be freely given, clear and easy to withdraw.

### What do we do with your personal data, and why?

[The table below sets out the legal basis for specific purposes of processing personal data]

Purpose of processing	Types of personal data	Legal basis for the processing of the personal data
<p><b>Managing, administering and carrying out our employment/recruitment process</b></p> <p>This includes, inter alia, recruiting candidates for current or future professional opportunities with our clients or with us, determining your suitability and eligibility for such opportunities, notify you about</p>	<ul style="list-style-type: none"> <li>• Data relating to your identity/contact details</li> <li>• Professional and work eligibility information</li> <li>• special (sensitive) personal data</li> <li>• Career criteria, preferences and expectations, Payroll administration/ other financial data</li> </ul>	<ul style="list-style-type: none"> <li>• Contractual obligation</li> <li>• Legal obligation (e.g. providing a safe place of work and avoiding unlawful discrimination)</li> <li>• Legitimate interests (to be able to fill in vacancies by proposing suitable candidates to our clients)</li> <li>• Your consent</li> </ul>

<p>available vacancies in accordance with your job search criteria, advising you in your job search, inform you about the general trends in the job market, notify you about the status of the application(s), providing your personal data to suitable clients, preparing you for interviews with our clients.</p>	<ul style="list-style-type: none"> <li>• Marketing and communication data</li> <li>• Photos and visual images</li> </ul> <p>Please note that we may process your personal data provided for the application for one job, in relation to another job for which we think it might be more suitable for you.</p>	
<p><b>Job offer and completing all pre-contractual formalities when retained for the position</b></p> <p>This includes, inter alia, making you a job offer and entering into a (consultancy or employment) contract with you, meeting our (contractual) obligations to our clients when you are offered a job, invoicing our clients for the placements we do.</p>	<ul style="list-style-type: none"> <li>• Data relating to your identity/contact details</li> <li>• Financial details and other benefits</li> <li>• Payroll administration</li> </ul>	<ul style="list-style-type: none"> <li>• Contractual obligation</li> <li>• Legitimate interests</li> <li>• Legal obligation</li> </ul>
<p><b>Receiving services/products</b></p> <p>This includes, inter alia, receiving services and products from our vendors, service providers and other suppliers and doing general administration in relation to it (such as archiving of contracts, processing of orders, invoicing and accounting).</p>	<ul style="list-style-type: none"> <li>• Data relating to your professional identity/contact details</li> <li>• Financial information (bank account number, cost centre, etc.)</li> <li>• Communications data (data on your interactions with us, your business interests, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>• Contractual obligation (necessary to enter into and implement a contract)</li> <li>• Legal obligation (e.g. accounting obligations)</li> </ul>
<p><b>Rendering services to our clients / Managing our relationship with you</b></p>	<ul style="list-style-type: none"> <li>• Data relating to your identity/contact details</li> <li>• Marketing and communication data</li> <li>• Photos and visual images</li> <li>• Communications data (data on your interactions with us, your business interests, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>• Contractual obligation</li> <li>• Legal obligation</li> </ul>
<p><b>Marketing and communications</b></p> <p>This includes, inter alia, sending promotional messages (such as newsletters, information on our services and event announcements).</p>	<ul style="list-style-type: none"> <li>• Data relating to your identity/contact details</li> <li>• Professional and work eligibility</li> <li>• Technical Data</li> <li>• Marketing and communication data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interest (to determine the effectiveness of promotional campaigns)</li> <li>• Your consent</li> </ul>
<p><b>Protecting/improving our website and services</b></p> <p>This includes, inter alia, using data analytics, troubleshooting, system maintenance, internal audits and related business analysis and tests to improve our website, customer relationship management and profiling the interests of candidates, employers and our clients.</p>	<ul style="list-style-type: none"> <li>• Data relating to your identity/contact details</li> <li>• Professional and work eligibility</li> <li>• Technical data (including e.g. information on your surfing behaviour)</li> <li>• Marketing and communication data</li> </ul>	<ul style="list-style-type: none"> <li>• Legal obligation</li> <li>• Legitimate interest (to perform statistical analyses in order to improve our website, recruitment services and keep it secure)</li> <li>• Your consent</li> </ul>

<p><b>Monitoring of diversity and equal opportunities</b></p> <p>This means meeting substantial public interest, such as equal opportunity monitoring initiatives and programs that promote diversity and inclusion.</p>	<ul style="list-style-type: none"> <li>• Demographic/sensitive data (e.g. age, race, ethnicity, nationality, gender, sexual orientation, religion, disability status/health).</li> </ul>	<ul style="list-style-type: none"> <li>• Legal obligation (Please be aware we can be under the legal obligation to share aggregated and anonymized diversity statistics with regulators)</li> <li>• Legitimate interests</li> </ul>
<p><b>Security and fraud prevention</b></p> <p>This includes, inter alia, ensuring the security of our website, services and at our offices, protecting against fraud, complying with legal requirements and keeping your personal data secure to prevent unauthorized loss, use, access, disclosure or alteration.</p>	<ul style="list-style-type: none"> <li>• Data relating to your identity and contact information</li> <li>• Professional and work eligibility information</li> <li>• Photos and visual images</li> <li>• ...</li> </ul>	<ul style="list-style-type: none"> <li>• Contractual obligation</li> <li>• Legal obligation</li> <li>• Legitimate interest (to ensure adequate security at our offices)</li> </ul>
<p><b>Compliance with Laws, legal proceedings, disputes and professional advice</b></p> <p>This includes, inter alia, complying with all laws and regulations, initiating legal proceedings in case of legal disputes, investigating and resolving any issue, dispute or complaint, taking professional advice (e.g. from attorneys), allowing controls by supervisory and law enforcement authorities (e.g. audits, the police), and responding to their inquiries, complaints or requests.</p>	<ul style="list-style-type: none"> <li>• Data relating to your identity and contact information</li> <li>• Professional and work eligibility information</li> <li>• Marketing and communication data</li> <li>• Technical data</li> <li>• Criminal records checks (if legally allowed)</li> <li>• Any information (potentially) relevant to a dispute or legal proceeding affecting us.</li> </ul>	<ul style="list-style-type: none"> <li>• Contractual obligation</li> <li>• Legal obligation</li> <li>• Legitimate interest (to protect our business against legal claims and to be able to run our business)</li> </ul>

## Special categories of personal data

Only in specific circumstances where it is necessary, we might also process special categories of personal data (hereinafter “**sensitive personal data**”). Sensitive personal data is personal data revealing your race or ethnic origin, political, religious or philosophical beliefs, physical or mental health, sexual life or sexual orientation, trade union membership, genetic data, biometric data, any related legal actions and any judicial/criminal past. For instance, to comply with health and safety regulations, we may process your health records in order to assess your ability to accept certain job offers, or we may process your food preferences for a marketing event, or your photo on your CV or your ID data for the payroll administration.

Koda Staff will ensure to apply a higher standard of protection by processing any sensitive personal data on one of the legal bases for processing, in addition with the application of one or more of the legal bases for processing sensitive personal data. In outline, these include:

- You have given your **explicit consent** to the processing (e.g. your tick in an unchecked box which says “I agree to the terms & conditions”);
- It is **necessary for employment law or social security law purposes**, in so far as it is authorized by law or collective agreement;
- It is **necessary to protect your vital interests** if you are physically incapable of giving consent (e.g. medical data can be provided to a doctor if you are unconscious in our office);
- It relates to your **personal data that you have manifestly made public** (e.g. you told us about your illness or you gave a publicity published interview);
- It is **necessary for our establishment, exercise or defense of legal claims**;

- It is **necessary for reasons of substantial public interest**;
- For **archive, statistical and research purposes**, in so far it is anonymized.

Unless we explicitly and specifically request for such sensitive personal data, please refrain from providing it. If you nonetheless provide us with such personal data, it shall be considered to constitute your express and unambiguous written consent to process it. However, we will delete this personal data if we think we cannot process it in a proper legal manner.

### Who do we share your personal data with or transfer it to, and why?

Your personal information will in particular be shared internally among Koda Staff directors, employees or agents if access to the data is necessary for performance of their roles.

From time to time, we rely on third parties to carry out certain business functions for us such as our payroll administration or Amplified IT (being our IT support) who will process your personal data on our behalf and for your account (as our “**processor**”). These external processors are carefully selected and contractually obliged to ensure the integrity of your personal data and put appropriate security standards in place to make sure your personal data is protected.

Since your personal data sometimes needs to be disclosed to third parties to the extent necessary in order to achieve the aforementioned purposes, it may be shared with the below-mentioned third parties:

- The company you represent, the vendor, supplier, consultants or other third-party service providers
- (Potential) employers or clients
- Employment references
- Law enforcement authorities or representatives, courts, public bodies or organizations, including competent data protection authorities
- Advisers, accountants or other specialists
- Social media companies when you contact us via social media or when we share content on those platforms
- Prospective or actual purchasers in case of business transfers
- Insurers and other benefit providers
- Banking institutions

For data subjects from the EU: Koda Staff will not transfer your personal data to countries outside the European Economic Area (EEA), except for the UK based on the adequacy decision of the European Commission pursuant to article 45 GDPR. Data transfers will in particular be to clients located in Denmark, the Netherlands and the UK.

For data subjects from the UK: Koda Staff will not transfer your data to countries outside the European Economic Area (EEA). Data transfers will in particular be to clients located in Denmark, the Netherlands and Belgium.

### How do we safeguard your personal data?

Koda Staff is committed to protecting the personal data you share with us. Koda Staff uses appropriate physical, technical, organizational and administrative security measures designed to protect your personal information from unlawful or unauthorized processing, accessing, using or disclosing and from accidental loss, destruction or damage.

However please note that, in relation to any personal data you submit to us online or via e-mail, we cannot guarantee the security of data sent to us in this way. Your information is held on servers hosted by our Internet Service Provider, which is not completely secure. Although we do our best to protect your personal data, the transmission of your personal data over the internet is at your own risk.

## How long do we retain your personal data?

We will only retain your personal data for a limited period of time, and for no longer than is necessary for the purposes for which we are processing it for. This retention period will be determined by the balanced interests of Koda Staff and the data subjects concerned and will depend on a number of factors, including:

- any laws or regulations that we are required to follow;
- whether we are in a legal or other type of dispute with each other or any third party;
- the type of information that we hold about you; and
- whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.

In general, in case of a limited contact between us, your personal data will be automatically deleted after the retention period in compliance with applicable law.

In case of a more extensive business relationship between us, we may retain your personal data longer:

- If you are (a contact person of) our client, vendor, service provider or any other supplier, we will retain your personal data at least for the remain of our business relationship and until all limitation periods for legal claims have expired. Hence, the retention period can be up to ten (10) years after termination of our business relationship. We might also anonymize certain of your personal data to the greatest extent possible from the moment we are informed hereof, unless this would adversely affect the integrity of certain document such as contracts, orders and invoices.
- If you are a (potential) candidate, we retain your personal data for as long as you are a candidate for a vacancy and at least for the duration of any active application process. We can retain your personal data for as long as you remain a candidate in our “recruitment pool”, which can be up to a maximum of five (5) years after any active application process, regardless of the outcome thereof, until you withdraw your consent.
- If you are one of our employees, we may retain your personal data for the duration of your employment.
- If you visit one of our offices, we might process your image on any security camera and your name and any company contact details when you sign in at the reception. We will retain this for only one (1) month, unless there has been a security incident and we need your personal data as evidence.
- With regard to marketing and other promotional communications, we will retain your personal data until you unsubscribe.

## What are your privacy rights and how can you exercise them?

Koda Staff is committed to being transparent about your personal data that we process and to meeting its data protection obligations, including fulfilling your rights as data subjects. Depending on the circumstances, you may have:

- **The right to access**, which means (i) the right to know whether your personal data is being processed and (ii) if so, to access it and to be provided with information relating to it, such as the purpose of the processing, the recipients or categories of recipients to whom it is disclosed and the envisaged period for which it will be stored. You have the right to receive a copy of your personal data undergoing processing. 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, repeated requests and 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);
- **The right to rectification**, which requires us to correct any inaccuracies in your personal data without undue delay;
- **The right to erasure or the right to be forgotten**, which requires us to erase your personal data, unless we are legally obliged to keep certain personal data;

- **The right to restriction** which require us to restrict or suspend processing of certain of your personal data;
- **The right to data portability**, which means the right to receive your personal data which you have provided to us, in a structured, commonly used and machine-readable format where we are processing it on the basis of your consent or a contractual obligation and the processing is carried out by automated means;
- **The right to object**, which means you can ask us to stop processing your personal data and
- **The right to not be subject to a decision based solely on automated processing** of your personal data.

Furthermore, you have the right to withdraw your consent at any time if we have relied on your consent as a legal basis for processing. This will however not affect the lawfulness of the processing we have done before you withdrew your consent. If we relied on legitimate interests as a legal basis for processing, you have the right to object to our processing at any time. In such case, we might inform you regarding (i) a compelling reason why our processing overrides your interests, rights and freedoms and thus is allowed to continue or (ii) our processing is necessary in relation to legal claims.

Please contact us via one of the contact details set out below if you would like to exercise any of your privacy rights. If you contact us to exercise your rights, we will reply in principle within one (1) month of the receipt of your request. Exceptionally, this can take longer (up to a maximum of three (3) months in total), but then we will inform you with our reasons for doing so.

Please make it clear (i) which privacy right and (ii) in which way you wish to exercise your privacy right (e.g. by e-mail). Be aware we might ask to provide us with further information to make sure we are helping the right person.

You also have the right to lodge a complaint with your national data protection authority, including:

#### United Kingdom

Information Commissioner's Office  
Wycliffe House, Water Lane  
Wilmslow, Cheshire, SK9 5AF  
Phone: +44 (0) 303 123 1113

#### The Netherlands

Autoriteit Persoonsgegevens  
Bezuidenhoutseweg 30  
P.O. Box 93374  
2509 AJ Den Haag - The Hague  
Phone: +31 70 888 8500

#### Denmark

Danish Data Protection Agency (Datatilsynet)  
Carl Jacobsens Vej 35  
2500 Valby  
Phone: +45 33 1932 00  
dt@datatilsynet.dk

#### Belgium

Gegevensbeschermingsautoriteit - Autorité de la protection des données (GBA-APD)  
Drukpersstraat – Rue de la Presse 35  
1000 Brussel – Bruxelles  
Phone: +32 2 274 48 00  
contact@apd-gba.be



## Marketing

We may send you information which we think you might be interested in or to market our employment and recruitment services to you. If allowed under applicable laws, we might not always ask your consent when sending such marketing materials, but you will always have to option to unsubscribe to any of such e-mails.

## Cookies and similar technologies

Our website uses cookies and other technology trackers to remember users' settings (e.g., language preference) and for authentication. Please read our [Cookie Policy](#) for any further information.

## Updates to this Notice

We may update this Notice from time to time to reflect changes to the way we handle your personal data. Any new update to this Notice will automatically be effective when it is published on [www.kodastaff.com](http://www.kodastaff.com). However, substantial or material changes will be updated to you by other means, such as by sending you an e-mail to announce the changes or using a pop-up Notice on our website to announce the update and obtain consent to the changes.

## Contact details

Koda Staff Limited is a company registered in the United Kingdom having its registered address at Suite 37/38 Marshall House 124 Middleton Road, Morden, Surrey, SM4 6RW United Kingdom and registered under company number 10248319.

You can also contact us at one of our offices:

### United Kingdom

Belle House, Platform 1, Victoria Mainline Station,  
London, SW1V 1JT  
Phone: +44 (0) 203 769 5217

### The Netherlands

Hullenbergweg 278-308, 1101 BV,  
Amsterdam Zuidoost  
Phone: +31 20 800 6305

### Denmark

Amaliegade 6, 2. tv., c/o Amalie 6.  
DK-1256 Copenhagen  
Phone: +45 78 72 45 83

### Belgium

Sint Michielslaan - Boulevard Saint-Michel 47,  
1040 Brussel - Bruxelles  
Phone: +32 2 588 96 94

If you have any further queries about how we process your personal data, you can contact us by sending an e-mail to [info@kodastaff.com](mailto:info@kodastaff.com).

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