



Origon Recruitment Limited – Data Privacy Policy

Our Business

Origon is the trading name of Origon Recruitment Limited. As a licenced recruitment firm, our sole activity is providing specialised financial recruitment services to clients in Ireland and abroad.

Privacy Overview

Since our inception in 2008, it has always been our policy that information supplied to our organisation by a candidate is owned by the candidate and only released to clients with the full knowledge and approval of the candidate. Any personal information you supply us with will be treated with the highest standards of confidentiality and security and strictly in accordance with GDPR regulations.

Personal Data – Candidates

Personal Data information is received from candidates who require the support of Origon to assist in making a career move or those making an enquiry about a future career move. This may be an application for a current recruitment assignment we are handling and/or for a future assignment. To allow us to successfully introduce our candidate to potential employers, the information we hold may include the following: Curriculum Vitae, registration form, application emails, Exam/Qualification details, employer details, remuneration information, and post registration details.

Candidates who apply to Origon for a particular vacancy are made fully aware throughout the recruitment process that we hold their details on file for that assignment and for other assignments we may handle. To maintain the accuracy of candidate information, we update candidate

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information from other sources including online professional business profiles, other industry information, ongoing contact with the candidate, phone calls and email correspondence. This could include information regarding additional qualifications or availability to handle interim assignments. However, we only process information necessary to assist and enhance our efforts to successfully introduce candidates to suitable employers.

How we use candidate information

We only release candidate information to a client for employment opportunities with that client. This only happens with the agreement (permission) of the candidate thus giving the candidate full control over how we use their information.

Protection of candidate information

Candidate information is stored on external servers (Google and Chameleon-i) which we subscribe to which are protected by firewalls and anti-virus software.

Legal Basis for Processing Personal Data

Origon have considered the lawful bases for processing and rely particularly upon contract, legitimate interest and statutory obligation as our lawful bases. Consent is utilised where absolutely required as the sole basis of processing. Origon relies upon the following legal bases for data collection:

1. Information is required in order to perform the contract of recruitment consultancy on behalf of you, the candidate, to potential employers. The basis of data gathering in that instance is contractual requirements. This will include identification information such as but not limited to name, address, date of birth, information regarding education/qualifications and reference checks.

2. Information is required in order to perform our statutory obligations such as tax returns and compliance with employment permit legislation. This information will include PPS numbers and where relevant Visa Documentation.

3. Information is processed in the legitimate interests of the business of the recruitment consultancy, and where so processed it will be in accordance with and subject to your data subject rights and entitlements.

Other Procedures

Staff have received GDPR training to ensure understanding of and compliance with Data Protection legislation.

Data Subject Rights

For the entirety of the time that we are in possession of your data, you have the following rights:

- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records and we will comply with this request in accordance with our own obligations to keep records for statutory purposes.
- **Right to restriction of processing** – where certain conditions apply you have a right to restrict the processing.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.



- **Right to object to automated processing, including profiling** – you also have the right not to be subject to the legal effects of automated processing or profiling.

These rights may on occasion need to be modified/curtailed by statutory or competing obligations, for example, you may request that we delete your data, however, if we have been your employer will can only do so after the statutory period of record retention has expired. In the event that we are obliged to refuse your request in accordance with your data subject rights, or if we are obliged to place conditions on our assent to your request, we will provide you with a reason as to why, which you have the right to legally challenge.

Data Protection Officer

All requests and queries regarding information held by us and how we use it should be made to our Data Protection Officer, Brian Carroll bcarroll@origon.ie or by writing to us at

Origon
Mespil House
Sussex Road
Dublin 4

In the event that you wish to make a complaint about how your personal data is being processed by us or by our partners, you have the right to complain to our Data Protection Officer (above).

Your full rights under Data Protection Legislation are outlined on the website of the Data Protection Commission.