



PRIVACY POLICY

1. Overview

This Privacy Policy explains what types of personal information, also referred to as personal data, we may collect about our employees, our client's employees, job applicants and candidates, how it may be used and how long it may be kept for.

2. What Personal Information Do We Collect?

We collect and maintain different types of personal information in accordance with applicable law. Some examples include:

- Name, gender, home address and telephone number, email address, date of birth, marital status, payroll number, and emergency contacts.
- Residency and work permit status, military status, nationality and passport information.
- Social security or other taxpayer/government identification number.
- Payroll information, banking details.
- Salary and benefit information.
- Absence records, Paid Time Off (including compassionate leave, jury service and holidays), pensions, insurance and other benefits information (including the gender, age, nationality and passport information for any spouse, minor children or other eligible dependents and beneficiaries).
- Information from interviews and phone-screenings.
- Dates of hire, date(s) of promotions(s), work history, technical skills, educational background, professional certifications and registrations, language capabilities, and training records.
- Forms and information relating to employees' health and welfare benefits.
- Height, weight and clothing sizes, photograph, videos, physical limitations and special needs.
- Records of salary history and expectations, performance reviews and appraisals, letters of recognition and commendation, and disciplinary and grievance procedures (including monitoring compliance with and enforcing our policies).

- Where permitted by law and applicable we may collect the results of credit and criminal background checks, the results of drug and alcohol testing, screening, health certifications, driving license number, vehicle registration and driving history.
- Information required for us to comply with laws, the requests and directions of law enforcement authorities or court orders (e.g., child support, student loans and debt payment information).
- Acknowledgements regarding our client's policies, including employee handbooks, ethics and/or conflicts of interest policies and computer and other corporate resource usage policies.
- Information captured on security systems, including Closed Circuit Television ("CCTV") and key card entry systems.
- Voicemails, e-mails, correspondence, documents, and other work product and communications created, stored or transmitted using our networks, applications, devices, computers or communications equipment.
- Dates of resignation or termination, reason for resignation or termination, information relating to administering termination of employment (e.g. references).
- Letters of offer and acceptance of employment.
- CV's, cover letters, previous and/or relevant work experience or other experience, education, transcripts, or other information you provide to us in support of an application and/or the application and recruitment process.
- References and interview notes.
- Information relating to any previous applications or any previous employment history with Cinnamon HR Consultancy Ltd.

3. **How Do We Collect Information?**

Generally, we collect personal information directly from you in circumstances where you provide personal information to us (e.g., during the recruitment process, enrolling in benefits or services). This data is essential for Cinnamon HR's operational use. However, in some instances, the personal information we collect has been inferred about you based on other information you provide us, through your interactions with us, or from third parties. When we collect your personal information from third parties it is either because you have given us express permission to do so, your permission was implied by your actions (e.g., your use of a third-party employee service made available to you by us), or because you provided explicit or implicit permission to the third party to provide the personal information to us

Where permitted or required by applicable law or regulatory requirements, we may collect personal information about you without your knowledge or consent.

We reserve the right to monitor the use of our premises, equipment, devices, computers, network, applications, software, and similar assets and resources. In the event such monitoring occurs, it may result in the collection of personal information about you. This monitoring may include the use of CCTV cameras in and around our premises.

4. How Do We Use Personal Information?

Cinnamon HR may use your personal information in order:

- To manage all aspects of an employee's employment relationship throughout the employee life cycle, including, but not limited to the establishment, maintenance, and termination of employment relationships.
- Assisting you with obtaining an immigration visa or work permit where required.
- For use in video conferencing.
- Maintain directories of employees.
- For employee engagement programmes, including surveys.
- Administer our occupational safety and health programmes.
- To protect the safety and security of our workforce, guests, property, and assets (including controlling and facilitating access to and monitoring activity on and in our premises and activity using our computers, devices, networks, communications and other assets and resources).
- To investigate and respond to claims against us.
- To maintain emergency contact and beneficiary details.
- To comply with applicable laws (e.g. health and safety, employment laws, office of foreign asset controls regulations, tax laws), including judicial or administrative orders regarding individual employees (e.g. child support payments).
- Carry out any additional purposes that we advise you of (if applicable law requires your express consent for such additional use or disclosure, we will obtain it from you).
- Carry out other purposes as part of our business activities when reasonably required by us.

5. Sharing Personal Information

Your personal information may be shared, including to our affiliates, subsidiaries, and other third parties, as follows:

- Where you request us or provide your consent to us.
- In order to carry out the uses of personal information described above (see, How We Use the Personal Information We Collect).
- When using or collaborating with third parties in the operation of our business.
- We may buy or sell businesses and other assets. In such transactions, employee information is generally one of the transferred business assets and we reserve the right to include your personal information as an asset in any such transfer. Also, in the event that we, or substantially all of our assets, are acquired, your personal information may be one of the transferred assets.

- Where required by law, by order or requirement of a court, administrative agency, or government tribunal, which includes in response to a lawful request by public authorities, including to meet national security or law enforcement requirements or in response to legal process.
- If we determine it is necessary or desirable to comply with the law or to protect or defend our rights or property.
- As necessary to protect the rights, privacy, safety, or property of an identifiable person or group or to detect, prevent or otherwise address fraud, security or technical issues, or to protect against harm to the rights, property or safety of our users, applicants, candidates, employees or the public or as otherwise required by law.
- Where the personal information is public.
- To seek advice from our lawyers and other professional advisers.
- To professional advisers (e.g. bankers, lawyers, accountants) and potential buyers and vendors in connection with the disposal or acquisition by use of a business or assets.

6. Retention of Personal Information

Except as otherwise permitted or required by applicable law or regulatory requirements, we will retain your personal information only for 6 years to fulfill the purposes for which the personal information was collected (including, for the purpose of meeting any legal, accounting or other reporting requirements or obligations).

You may request that we delete the personal information about you that we hold. There are instances where applicable law or regulatory requirements allow or require us to refuse to delete this personal information. In the event that we cannot delete your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

7. Requests to Access, Delete, Correct Information, or Withdrawal of Consent

Please submit requests to access, delete, or correct your personal information to hello@cinnamonhr.co.uk. Any request by you to us to delete your personal information may not result in deletion of any information submitted by you to a third-party provider. If you require the third-party to delete any of your personal information, you must contact the third party directly to request such deletion.

8. Access to Your Own Personal Information

You can ask to see the personal information that we hold about you. If you want to review, verify or correct your personal information, please send an email to hello@cinnamonhr.co.uk. When requesting access to your personal information, please note that we may request

specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you.

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous. In the event that we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

9. Questions, Concerns or Objections

Should you have any questions, concerns or objections with this policy or the information we hold on you please speak to HR. This policy was issued on 1 April 2020 and will be reviewed on 1 April 2023. For any queries please contact hello@cinnamonhr.co.uk