

## Artemis Privacy Policy

### 1. Introduction

Artemis Executive Recruitment Limited (**Artemis, we and us**) values your privacy and we are committed to protecting and safeguarding your privacy rights. Our Privacy Policy describes how we collect your personal information, what we do with it, how we store it, and the circumstances in which we may disclose it. Please take a moment to familiarise yourself with our Privacy Policy, and let us know if you have any queries.

Our Privacy Policy applies to the personal information of our website users, candidates, clients, suppliers, other persons who we may contact in order to find out more about our candidates, and persons who have been designated as a referee or emergency contact.

We take the privacy of personal information seriously, and we comply with the Privacy Act 2020 (**NZ Privacy Act**), the Health Information Privacy Code, the Privacy Act 1988 (Cth) which incorporates the Australian Privacy Principles (**AU Privacy Act**) and European Union's General Data Protection Regulation (**GDPR**).

While only people resident in the European Union are entitled as of right to the protections established by the GDPR, as a part of our commitment to privacy we have decided to make those protections available to all our candidates, clients, suppliers and other users of our services, globally, as set out in our Privacy Policy.

### 2. What is personal information?

"Personal information" is the New Zealand term for "personal data" as defined in the GDPR. It means any information that can identify you either directly or indirectly (i.e. by reference to other information we have access to). It can be anything from a name, a photo, an email address, employment details, interactions on social media, medical records, or an IP address.

### 3. Who is responsible for your personal information?

Artemis is the data controller of your personal information, which means that we are the entity that determines the purposes and means of the processing your personal information. The term "processing" is used as defined in the GDPR. It includes collection, storage, and all of the ways we use personal information when we provide our services to you.

### 4. What personal information do we collect?

**Personal information you provide to us.** We may collect the following personal information, which may include health information (which includes information or an option about your health) and other sensitive information, from you:

- when you register with us as a candidate we may collect your name, age, address, telephone number, email, skype name, educational qualifications, drivers license details, employment history, details of any directorships, immigration status, financial information (where we need to carry out credit checks) and medical/health details, and any other information you provide ;
- when you register with us as a client may collect your name and email address (if you are your organisations contact person) and your billing details, which may include credit card details;

- if you send an enquiry to us via our website (<https://artemisnz.com/>) we collect your name, email address and any personal details included in your message to us;
- if you respond to a job listing via a third-party website (such as LinkedIn or Seek) we collect your name, email address and any personal information contained in your application;
- [if you are registered with LinkedIn and your status is set as looking for opportunities, we may collect the information you have uploaded to LinkedIn; and
- we may also collect personal information you provide to us during a telephone call or meeting with us.

**What if you choose not to provide personal information that has been requested?** It is your decision whether you want to share your personal information with us. However, this may mean that we are not able to provide you with all of our services and our ability to find you a candidate or place you in a role may be limited.

**Personal information we collect from third parties.** We may obtain personal information about you from third parties when:

- with your consent, we instruct a third-party to carry out a financial or criminal check;
- with your consent, we carry out reference check;
- you have been nominated by a candidate to be a referee;
- you have been nominated as an emergency contact we collect your name and contact details; and
- we carry out public searches on you, including reviewing your LinkedIn profile and other publically available social media.

**Personal information we may collect automatically:** We may collect personal information about you automatically when you interact with our website. We may collect technical information about your equipment, browsing actions and patterns. This includes your IP address, browser type and version and time zone settings, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website (**Technical Information**). We collect this information by using cookies and other similar technologies. Please refer to 7 for further information on our use of cookies.

**Information about minors:** Our website and services do not address anyone under the age of 18. We do not knowingly collect personal information from young people under 18. In the case we discover that a young person under the age of 18 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian, and you are aware that your child has provided us with personal information, please contact us so that we will be able to carry out the necessary actions.

**Sensitive information:** Where appropriate, the personal information we collect may include information or an opinion about your health, disability, racial or ethnic origin, religion, membership of a professional or trade association or criminal convictions. We will only collect and use such sensitive information with your express consent and you have the right to withdraw your consent at anytime. When seeking your consent we will also let you know if provision of the sensitive information is voluntary or not, who we may share the information with and the consequences (if any) if you choose not to provide the requested information.

## 5. How may we use your personal information?

We rely upon a number of lawful grounds to ensure that our use of your personal information is compliant with applicable laws. We set out the type of personal information, purpose for our use and the legal grounds we rely on below.

Types of personal information	Purpose	Legal ground
Candidate Information (name, age, address, telephone number, email, skype name, educational qualifications, driver's license details, employment history, details of any directorships, emergency contacts, immigration status, and financial information and medical/health details)	We use personal information about you to enable us to find you employment opportunities that are tailored to your skills and interests.	Consent. We will seek your consent before putting you forward for a role, and you can withdraw your consent at any time.
Client Information (name and contact details)	If you are our client we need to use information about you, or individuals within your organisation, in the course of finding candidates who are the right fit for your organisation. The main reason for using client information is to ensure our relationship runs smoothly and we can carry out our contractual arrangements with you (e.g., providing your information to candidates we've identified as being the right fit for you/your organisation).	Performance of our contract with you.
Supplier Information (name, contact details and billing information)	To ensure effective operations we need information from our third party suppliers such as contact details of relevant individuals at your organisation so we can communicate with you. We also need information such as bank account details to pay for your services as appropriate.	Performance of our contract with you.
Emergency contacts contact information, such as telephone number	Where you've been listed as an emergency contact by a candidates or one of our employees, we may use your contact details for the purpose of contacting you in an emergency.	Consent. We require candidates and employees to seek your consent before you provide us with your personal information. If you do not consent to being an emergency contact we will delete your personal information as soon as practicable.
Technical Information (as defined in section4)	We may use Technical Information to help us provide our website to you and to help us understand how you use the website so that we can improve our services.	Our legitimate business interest in improving our website.
Marketing information(email)	We may use your email address	Consent. You have the right to

address)	to send you marketing communications where you have consented to receiving such communications.	withdraw your consent at any time by contacting us or clicking on the unsubscribe link on such communications.
Contact information (your name, email address and address)	We may use your contact details to enforce our terms and monitor, prevent and detect fraud.	Our legitimate business interest.
Credit checks (name, email address and drivers licence)	To undertake credit checks on you. We will only undertake credit checks if the role carries a significant financial risk.	Consent. If a credit check is necessary for the role you are applying for, we will seek your consent, which you have the right to withdraw at any time. If you do not consent, the employer may be entitled not to offer you the role.
Criminal record checks (name, email address and drivers licence)	To instruct third parties to carry out checks on your criminal history.	Consent. We will seek your express consent before carrying or instructing a third party (such as the Ministry of Justice or Land Transport New Zealand) to carry out, a check on your criminal history. You have the right to withdraw you consent at any time. If you do not consent, the employer may be entitled not to offer you the role.
References (name and contact details)	To carry out a reference check on a candidate.	Consent. We will not contact or provide details of your references to the employer without your prior express consent. You have the right to withdraw your consent at any time.

## 6. How may we share your personal information?

We may disclose or share your personal information with third parties in the following circumstances:

- **With your consent.** We may share your personal information with third parties when you have provided your consent or requested us to do so. For example, with a prospective employer, a third party that carries out criminal or financial checks on our behalf or a referee.
- **Third party service providers.** We may share your personal information with companies who provide us services (such as information processing, web analytics services, legal, marketing automation platforms and social media services). We require such service providers to contractually commit to protect the security and confidentiality of personal information they process on our behalf.
- **Legal purposes.** Where it is legally required by a third party or law enforcement authority in any jurisdiction (in which case we will generally require a production order or similar court order unless necessary to prevent or lessen a serious threat to public health or public safety or the life or health of you or someone else).

- **To enforce our rights, prevent fraud and for safety.** To protect and defend our rights, property or safety or that of third parties, including enforcing our privacy policy and terms of use, or in connection with investigating and preventing fraud or other suspected illegality or security issues.
- **To protect our website.** Where it is needed to detect, prevent or address fraud, security or technical issues.
- **Business sale.** In the event we sell the business or assets we may disclose your personal information to the prospective buyer of such business or assets. If substantially all of our assets are acquired by a third party, your personal information will be one of the transferred assets.

## 7. Cookies and other technologies

To improve your experience, our website may use “cookies” and other technologies such as pixel tags and web beacons. A cookie is a small text file that our website may place on your device as a tool to remember your preferences. These technologies help us better understand user behaviour, tell us which parts of our website you have visited, and facilitate and measure the effectiveness of our services. Pixel tags enable us to send email messages in a format you can read, and they tell us whether mail has been opened. We may use this information to reduce or eliminate messages sent to you.

Our website uses service Google Analytics in order to better understand your needs and optimise our service experience. Google Analytics is a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and webpage usage. By visiting our website, you consent to the processing of data about you by Google in the manner described in [Google’s Privacy Policy](#). You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of our website and your use of our services will be impaired.

We use Mailchimp for sending our emails and as our marketing automation platform. As such, we share some of your personal information with Mailchimp in order to send you newsletters and updates about relevant topics of interest. By agreeing to receive communications from us, you acknowledge and authorise that the information you provide will be transferred to Mailchimp for processing in accordance with its [Privacy Policy](#). For information on how to opt out of Mailchimp data analytics, visit the Mailchimp [preferences page](#).

## 8. How do we keep your personal information secure?

We have reasonable technical and organisational measures in place designed to prevent unauthorised access to, and misuse of, your personal information. Electronic information is stored on a secure server that is protected in controlled facilities. Unfortunately, no data transmissions over the Internet can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure please contact us immediately.

As we are a paperless office, we don’t have many of them, but where we do, documents and papers are stored and locked away.

## 9. How long do we keep your personal information for?

We retain your personal information for as long as we need it to provide you with our services. After this, we will only keep your information if it is necessary or required to meet legal or regulatory requirements, resolve disputes, or to prevent fraud or abuse. Generally, if we have not had meaningful contact with you (or the company you are working for, or with when this applies) for a period of two years we destroy your personal information.

## 10. International data transfers

Our business operates in New Zealand but businesses that support our services may be located outside New Zealand. This means that information may be held and processed outside New Zealand.

If you are located in the European Economic Area (EEA) this means that your information may be transferred outside the EEA. However, it will only be transferred to countries (like New Zealand) that have been recognised by the European Commission as providing an adequate level of protection of personal information, or to third parties who approved transfer mechanisms in place (such as the European Commission's Standard Contractual Clauses or by ensuring that the third party is Privacy Shield certified).

## 11. Security and storage of data

We take reasonable precautions, including administrative, technical, and physical measures, to safeguard personal information against loss, theft, and misuse, as well as against unauthorised access, disclosure, alteration, and destruction. Unfortunately, no data transmissions over the Internet can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure please contact us immediately. Our contact details are set out in paragraph 17 (Contacting us) below.

All data we collect is stored with Microsoft, which has data centres in various locations around the world but we require Microsoft to store our content in servers located in Australia and Singapore.

## 12. Privacy breaches

A privacy breach occurs where there is an unauthorised or accidental access to, or disclosure, alteration, loss, or destruction of, personal information held by us or an action that prevents us from accessing personal information on either a temporary or permanent basis.

If we learn of a privacy breach involving any of our services we will assess whether the privacy breach is likely to cause serious harm to an affected individual or individuals. If our assessment finds that the privacy breach has caused serious harm to an affected individual or individuals, or is likely to do so, we will notify the individual or individuals and the relevant supervisory authority within the timeframes prescribed by the applicable local laws.

## 13. Your rights

We are committed to protecting and respecting your privacy, therefore, we have extended the following rights granted under the GDPR to all users of our services, regardless of where you live. These rights are the:

- **right to access and rectification:** You have the right to ask us to confirm what information we hold about you.
- **right to rectification:** You can request that we update or correct your personal information at any time.
- **right to erasure:** In certain situations you have the right to request that we erase your personal information. We will respond to your request and will only disagree if certain limited conditions apply.
- **right to object:** Where we are using your personal information because we believe it necessary for our legitimate interest to do so, and you do not agree, under certain circumstances you have the right to object.
- **right to withdraw consent:** Our processing of your personal information is based solely on your consent, you may withdraw your consent at any time. Once we have received notification that you

have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so.

- **right to data portability:** You can ask for a copy of your personal information in machine readable form that supports re-use and you can request that we transfer your personal information to another entity.
- **right to lodge a complaint:** You can raise a complaint with us or a supervisory authority if you are not happy with how we are processing your personal information. Your local supervisory authority will be able to give you more information on how to submit a complaint

If you wish to exercise any of your rights, please contact us using the details set in section 17.

## 14. Third-party sites and services

Our website may contain links to third-party websites, products, and services. Information collected by third parties, which may include such things as location data or contact details, is governed by their privacy practices. We encourage you to learn about the privacy practices of those third parties.

## 15. NZ law

Subject to the rights you may have under the GDPR or the AU Privacy Act, our privacy policy is governed by the laws of New Zealand and you submit to the jurisdiction of the New Zealand courts.

## 16. Changes

We may update our Privacy Policy from time to time by publishing an updated privacy policy on our website. We encourage you to regularly check our website. We will notify you by email of any material changes to our privacy policy.

## 17. Contacting us

If you have any comments, suggestions, or questions concerning our Privacy Policy or to exercise any of your rights you can write to us at the following address:

Artemis Executive Recruitment Limited  
Level 1, Stanbeth House  
22-28 Customs Street East  
Auckland 1010  
**New Zealand**

or you can send an email to [hello@artemisnz.com](mailto:hello@artemisnz.com).

**Date: 1 December 2020**