

Recruitment Notice on the Processing of Personal Data	Effective Date:	01/12/2022
	Revision Number:	1

LEARNING TREE INTERNATIONAL LIMITED -

EU APPLICANT PRIVACY NOTICE (INDEPENDENT CONTRACTOR RECRUITMENT)

1. Introduction

This Notice is intended to provide information regarding the use of personal data about applicants for independent contractor associate positions at Learning Tree International Limited (“**Learning Tree**”, “**Company**”, “**we**” or “**us**”), part of the Learning Tree International Group). This Notice applies to all applicant personal data related to recruitment that is processed by Learning Tree, regardless of whether it is maintained in electronic format or in a structured filing system.

2. Identity of the Data Controller

The data controller responsible for processing your personal data is Learning Tree International Limited, which is registered with company number **01392643** and maintains its registered office at Leatherhead House, Station Road, Leatherhead, Surrey, KT22 7FG.

You may contact us at this address or:

By email: dataprotection@learningtree.co.uk

By telephone: 0800 282 353

Any questions about this Notice may also be sent to: Data Protection, Learning Tree International, Leatherhead House, Station Road, Leatherhead, Surrey KT22 7FG

3. Lawful Basis and Purposes for Processing Personal Data

For recruitment purposes we collect, store, use and otherwise process personal data about independent contractor applicants in order to make hiring decisions. We are committed to the protection of your personal data in line with the data protection principles set out in the EU General Data Protection Regulation (“GDPR”)

We collect and process independent contractor applicants’ personal data for the purpose of administering applications and for various recruitment purposes as necessary prior to making a hiring decision and, where relevant, entering into a contractual agreement on a per event basis. The lawful bases for processing include:

- **for us to pursue our legitimate interests**, including for the purposes of the recruitment process, for maintaining recruitment records, assessing your suitability for the required services, confirming your suitability for the required services, facilitating the selection process, deciding which applicant an independent contractor opening shall be offered to, conducting reference checks, communicating with you, business process execution and internal management, business reporting, systems reporting and access, safeguarding the security of our

infrastructure, premises, assets and office equipment, including the prevention of criminal activity, defending legal claims;

- **consent**, including obtaining your consent to validate your qualifications with accrediting bodies, to verify information, to consider you for other independent contractor engagements with Learning Tree; and any background checks that may be required from time to time for specific Clients.

We will notify you of any changes to information we collect or to the purposes for which we collect and process it in this context.

4. Categories and Sources of Personal Data that We Process

This Privacy Notice covers any of the personal data that applicants submit to Learning Tree for the onboarding process. This may include but is not limited to the following information:

- Your name, contact details and applicant status;
- Details of your qualifications, skills, experience, biography and job history;
- Information included in your CV or cover letter, such as job history, academic background, skills and competencies, personal interests, languages spoken, professional and trade qualifications, questionnaire results;
- Willingness to travel to deliver training worldwide at Client locations.
- Your rate expectations.
- Limited Company number and status

Names of relatives working at Learning Tree may collect this information in a variety of ways, including directly from applicants, via hard copy and web-based application forms, from recruiters and recruitment agencies, through individual referrals and from test results where relevant to the position.

We may also review social medial profiles (generally professional networks) and consider information that is publicly available.

Learning Tree may also collect personal data about applicants from other third parties, subject to your consent or required by law, including academic history, accrediting bodies, information from background check providers and information from criminal records checks where necessary or required by law. Learning Tree will seek information from third parties only once an offer of work has been made and once we have communicated to you that we will be doing so.

We process limited amounts of **special categories** of your personal data in order to comply with our legal obligations, when necessary for the purposes of carrying out obligations and to make reasonable adjustments for candidates with disabilities.

5. Data Sharing: Intra-Group and Third Parties

An applicant's personal data may be shared internally within Learning Tree in the UK as part of the recruitment process. This includes interviewers involved in the recruitment process, managers in the business area where there is work available, other independent contractors engaged by Learning Tree to assess your suitability, senior management, and IT staff if access to the data is necessary for the performance of their roles. Your personal data may be transferred to Learning Tree AB in Sweden, within the European Economic Area (EEA) if your role is likely to involve working closely with our affiliated company. We have Data Transfer Agreements in place for such transfers.

Depending on the position sought, an applicant's personal data will be stored on secure servers at both Learning Tree and our parent company, Learning Tree International Inc., in the USA.

We may need to share some of your personal information with other parties, including in-house and external recruiters and recruitment agencies, accrediting bodies, associate resource managers and service providers. When we do so, we ensure that contractual measures are in place where necessary to protect applicants' personal data.

6. International Transfers

We may transfer your personal data outside of the European Economic Area (EEA) in order to share and review your application with senior management and decision-makers at our parent company and to make your services available to our international associate resource teams. Learning Tree international, Inc. prior to making an offer to engage in independent services, international transfers within the Learning Tree Group of Companies are governed either by the UK Information Commissioner's Office (ICO)'s International Data Transfer Agreement or by the EU Commission's Standard Contractual Clauses as supplemented by the ICO's UK Addendum. We may also transfer applicant data to third-party vendors outside the EU, such as accrediting bodies located outside of the European Economic Area. Where we do so, these transfers are governed by safeguards approved for use by the ICO, such as the UK International Data Transfer Agreement or the UK Addendum in conjunction with the EU Commission's Standard Contractual Clauses. You can obtain a copy of relevant safeguards used by contacting dataprotection@learningtree.co.uk

We will not use your personal data for any purpose other than the recruitment exercise for which you have applied.

7. Your Rights

The GDPR provides you with certain rights in relation to the processing of your personal data, including to:

- **Request access to personal data about you** (commonly known as a “**data subject access request**”). This enables you to receive a copy of the personal data we hold about you.
- **Request rectification, correction, or updating to any of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure of personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to Process it. You also have the right to ask us to delete or remove personal data where you have exercised your right to object to processing (see below).
- **Request the restriction of Processing of your personal data.** This enables you to ask us to suspend the processing of personal data about you (e.g. if you want us to establish its accuracy or the reason for Processing it).
- **Request the transfer of personal data provided by you (“data portability”).** This enables you to ask us to provide you, in machine-readable format, personal data that you have provided to us for transfer to another controller.
- **Object to specific types of processing in some circumstances,** including direct marketing, processing based on legitimate interests, processing for research or

statistical purposes, and decisions based solely on the basis of automated decision-making, including profiling.

You have the right to withdraw your consent at any time by emailing dataprotection@learningtree.co.uk.

The exercise of these rights is not absolute and may be subject to certain pre-conditions and exemptions under the GDPR. Should you wish to exercise the rights accorded by the GDPR, please contact dataprotection@learningtree.co.uk.

You also have the right to file a complaint with the ICO if you are not happy with the way Learning Tree processes your personal data and our response to your request.

8. Data Retention

Applicant personal data will not be kept for longer than is necessary for the recruitment process unless the data is relevant to a successful candidate's services to Learning Tree. In such cases, relevant data will be transferred to our Independent Contractor information system in accordance with Learning Tree's EU Independent Contractor Privacy Notice. Unsuccessful applicants' personal data in structured files will be deleted within 12 months of the decision unless the applicant consents to our retaining the information for a defined period for the purpose of being considered for other potential services available.