



## **Privacy Policy for recruitment using HireHive**

The service for handling recruitments and simplifying the application and hiring process (subsequently the “Service”) within Nasc, the Migrant and Refugee Rights Centre is operated by using the Software HireHive (HireHive Ltd C/O Republic of Work, 12 S Mall, Centre, Cork, T12 RD43, Ireland, [www.hirehive.com](http://www.hirehive.com), “the Provider”).

It is important that the persons using the Service (subsequently the “Users”) feel safe with, and are informed about, how we handle User’s personal data in the recruitment process. We strive to maintain the highest possible standard regarding the protection of personal data.

We process, manage, use, and protect User’s Personal Data in accordance with this Privacy Policy (“Privacy Policy”).

1. Nasc, the Migrant and Refugee Rights Centre CLG (subsequently “Nasc”) is the controller in accordance with current privacy legislations. The Users’ personal data is processed with the purpose of managing and facilitating the recruitment of employees to Nasc.

### **2. Collection of personal data**

We are responsible for the processing of the personal data that the Users contributes to the Service, or for the personal data that we in other ways collect with regards to the Service. We collect personal data about Users from Users when Users

- i. make an application through the Service or otherwise, adding personal data about themselves either personally or by using a third-party source such as LinkedIn;
- ii. provides identifiable data in the chat (provided through the website that uses the Service) and such data is of relevance to the application procedure;

### **The types of personal data collected and processed**

The categories of personal data that can be collected and processed through the Service and can be used to identify natural persons are: names, e-mails, pictures and videos, information from LinkedIn-accounts, recruiting communication and all other information that the User has provided through the Service in the course of the recruitment process. On principle, only data that is relevant for the recruitment process is collected and processed.

### **Purpose and lawfulness of processing**

The purpose of the collecting and processing of personal data is to manage the recruiting process. The lawfulness of the processing of personal data is, in case of provision of the data through the User the consent pursuant Art. 6 para 1 lit. a) GDPR or pursuant Art. 6 para. 1 lit. b) GDPR processing during the fulfilment of a pre-contractual relationship (the employment) by request of the User, and, in case of data collection by us through social media platforms, according to Art. 6 para 1 lit. f) GDPR our legitimate interest to simplify and facilitate recruitment.

Personal data that is processed with the purpose of aggregated analysis or market research is always made unidentifiable. Such data cannot be used to identify a certain User. Thus, such data is not considered personal data. The User has the right to withdraw his or her consent to



the processing of their personal data at any time, by contacting Nasc using the contact details listed in section 6.

### **Storage and transfers**

The personal data collected through the Service is stored and processed inside the EU/EEA, such third country that is considered by the European Commission to have an adequate level of protection, or processed by such suppliers that have entered into such binding agreements that fully complies with the lawfulness of third country transfers (as the Standard Contractual Clauses (SCC)) or to other suppliers where the adequate safeguards are in order to protect the rights of the data subjects whose data is transferred. To obtain more information regarding such adequate safeguards and data recipients, contact us using the Contact details listed in 6. The data is hosted in Ireland.

### **How long the personal data will be processed**

If a User does not object, in writing, to the processing of their personal data, the personal data will be stored and processed by us for a maximum of 12 months after the recruitment process for the specific role they applied for has ended. After this period, the User's data will be deleted permanently.

### **3. Users' rights**

Users have the right to request information about the personal data that is processed by us, the right to rectification or deletion of their data or limitation of processing, and a right to object to the processing of their data. In order to exercise those rights, Users can contact Nasc using the contact information stated in clause 6.

User has the right to lodge a complaint to the supervisory authority regarding the processing of personal data relating to him or her, if the User considers that the processing of personal data infringes the legal framework of privacy law.

### **4. Transfer of personal data to third party**

We will not sell or otherwise transfer Users' personal data to third parties. We may transfer Users' Personal Data to interview panellists that are involved in the shortlisting or interview process for the vacancy you have applied for.

If you are hired, the data will be transferred to Nasc's internal system where it will be processed as employee data. This transfer of personal data takes place in particular for the fulfilment of the contract and on the basis of our legitimate interest in the organisation of internal work processes (e.g. shared services).

### **5. Changes**

We have the right to, at any time, make changes or additions to the Privacy Policy. The latest version of the Privacy Policy will always be available through the Service. A new version is considered communicated to the Users when the User has either received an email informing the User of the new version (using the e-mail stated by the User in connection to the use of the Service) or when the User is otherwise informed of the new Privacy Policy.

**6. Contact** For questions, further information about our handling of personal data or for contact with us in other matters, please use the below stated contact details; Nasc, 34 Paul Street, Cork City, Ireland.