



OISC Reference No:F200300063
Vyman House, 104 College Road, Harrow, Middx, HA1 1BQ
T: 02088635811
info@vira.co.uk | www.vira.co.uk
Company No. 4039493 |
VAT No. 802470658

Data Privacy Policy

Version: Final 1.0
Date Issued: 16th April 2018
Author: Anisha Brahmhatt
Title: Data Privacy Officer



OISC Reference No:F200300063
Vyman House, 104 College Road, Harrow, Middx, HA1 1BQ
T: 02088635811
info@vira.co.uk | www.vira.co.uk
Company No. 4039493 |
VAT No. 802470658

Version Control:

#	Date Last Amended:	Author:	Action Taken:
0.1	25 TH March 2018	Anisha Brahmbhatt	Draft version produced
1.0	16 TH April 2018	Anisha Brahmbhatt	Final version issue (post internal review).
1.1	22 nd May 2018	Anisha Brahmbhatt	Minor update – email address updated.

Contents

1. Introduction	4
2. Purpose	4
3. Scope	4
4. Objectives	4
5. What personal data does Vira Collect?	5
5.1. Candidates	5
5.2. Clients	5
5.3. Supplier Data	6
5.4. General Information	6
6. What will Vira do with your Personal Data?	6
7. How do we transfer your Personal Data?	7
7.1. Vira International global offices, authorised partners or third parties:	7
7.2. International transfers of Personal Data:	8
7.3. Mandatory disclosures:	8
7.4. Mergers and acquisitions:	8
7.5. Other:	8
8. What steps are taken to safeguard Personal Data?	8
9. Data Quality	9
10. Your Rights	9
10.1. Right to object:	9
10.2. Right to withdraw consent:	9
10.3. Data Subject Access Requests (DSAR):	9
10.4. Right to erasure:	9
10.5. Right of data portability:	10
10.6. Right to lodge a complaint with a supervisory authority:	10
11. Whom to contact?	10
12. Changes to this Policy	11



OISC Reference No:F200300063
Vyman House, 104 College Road, Harrow, Middx, HA1 1BQ
T: 02088635811
info@vira.co.uk | www.vira.co.uk
Company No. 4039493 |
VAT No. 802470658

1. Introduction

Vira International is committed to respecting your data privacy and in complying with applicable data protection and privacy laws and regulations.

This Privacy Policy (“Policy”) informs you about how Vira International processes information it collects about you, during Vira International’s recruitment, work permit and immigration consulting activities.

It sets out what kind of Personal Data Vira International may collect about you and from other sources, how Vira International processes your Personal Data during its recruitment, work permit and immigration consulting activities, and what rights you have in relation to such data. “Personal Data” means information relating to you or another identifiable individual.

We may provide you additional privacy information to this Policy via supplements and other notices. If there is a difference between such notices and this Policy, the notices should be considered first.

Our services and websites may contain links to other companies’ websites and services that have privacy policies of their own. Vira International is not responsible for the privacy practices of others and we recommend you read their privacy notices.

2. Purpose

The purpose of this policy is to ensure that Vira International and its staff (meaning permanent, fixed term, and temporary staff, any third party representatives or subcontractors, agency workers, volunteers, interns and agents engaged with Vira International), conduct their business practices in a manner compliant with the Data Protection Act 1998 (“DPA”) and the General Data Protection Regulations (GDPR:2018) and its principles to ensure that Data Privacy is effectively managed and specifically all Personally Identifiable Information (PII) is kept secure, accurate and up-to-date at all times.

3. Scope

This policy applies to all Vira International candidates, clients, suppliers and members of the organisation and those contracted to work on behalf of Vira International, and is to be followed at all times. Its aim is to protect the rights of individuals and applies to all personal and sensitive information that is used, stored and transmitted either electronically or via paper-based methods.

4. Objectives

The objective of this policy is to protect the rights of individuals with regards to the personal information known and held about them by Vira International in the course of business and ensure

that every business practice, task and process carried out by Vira International, is compliant with each principle of the Data Protection Act 1998 and the General Data Protection Regulations (GDPR:2018).

Vira International aims to ensure that staff are trained and aware of the guiding principles behind Data Protection of PII, namely to ensure:

- **Confidentiality** – That PII will be handled with due regard to its sensitivity and appropriate security measures put in place to maintain its confidentiality;
- **Integrity** – That the PII which is held by Vira International is up to date, accurate and can be relied upon.
- **Availability** – That the PII will be available to the data subject upon request (as per their ‘Subject Access Rights’)

This policy is in place to ensure regulatory and legal compliance at all times with regards to handling and processing personal data.

5. What personal data does Vira Collect?

Vira International collects Personal Data directly from you (either via email, over the telephone or directly in person) as well as from other available sources to the extent relevant and permitted by applicable local law. Subject to applicable local law and practice, the categories of Personal Data that are typically collected and processed in the recruitment context are:

5.1. Candidates

When you create a profile in our information management system or otherwise interact with Vira International (either directly or through an agency or other third party), you may be asked to provide Vira International with your information, such as your:

- Name, street address, telephone number and email address and other contact details;
- Competences, skills, experience and education, e.g. your CV or resume, previous employments, educational details and qualifications, third party references.
- preferences, e.g. preferred country of employment, areas of interest as well as your preferred ways to be contacted by Vira International); as well as
- User identity, e.g. Passport copy, driver’s licences or birth certificates as well as other similar information used in connection with authenticating you.

5.2. Clients

When you create a profile in our information management system or otherwise interact with Vira International (either directly or through an agency or other third party), you may be asked to provide Vira International with your information, such as your:

- Hiring Manager Information, such as: name, contact details. – e.g. hiring manager contact details,

- Company Information, such as: office address, company number, sponsorship licence information, organisation chart, finance information for billing purposes).
- Company employee information, such as: staff previously placed by Vira International at your organisation, and their work permit renewal status.

5.3. Supplier Data

We need a small amount of information from our Suppliers to ensure that things run smoothly. We need contact details of relevant individuals at your organisation so that we can communicate with you. We also need other information such as your bank details so that we can pay for the services you provide (if this is part of the contractual arrangements between us).

5.4. General Information

Technical Information: When you access our services online, our web servers automatically create records of your visit. These records typically include:

- IP-address,
- access times,
- the sites linked from,
- pages visited,
- the links and features used,
- the content viewed or requested,
- browser or application type,
- Language and other such information.

When you use our services or otherwise interact with us over telecommunications networks, certain additional information, such as your mobile subscription number, may be transmitted to Vira International by the telecommunications operator as a standard part of that communication.

Other information such as information found from public sources as well as information related to credit or background checks, (including Home Office checks), depending on the position you are applying for, and where necessary for the recruitment activities.

6. What will Vira do with your Personal Data?

Vira International will collect, utilise, store and otherwise process your Personal Data for the purposes of Vira International's recruitment, work permit, immigration consulting and any other resourcing activities or purposes you have consented to.

Whenever necessary and subject to statutory record-keeping requirements, Vira International will delete and/or anonymize Personal Data that are no longer needed. If there has not been any recent activity on your profile, we may delete your profile after a reasonable time in compliance with applicable laws.

Vira International will process your Personal Data for the following purposes:

- Communicating with you, in context of recruitment activities, such as:
 - To obtain additional information where necessary

- To inform you of available vacancies or suitable candidates;
 - To provide you with information relating to your application and to fulfil your requests.
- Managing recruitment, work permit, immigration consulting and other resourcing activities, including activities related to organizational planning. In the course of recruitment activities, we may use your information:
 - To set up and conduct interviews and assessments;
 - To evaluate, select and recruit applicants;
 - To conduct background and credit checks and assessments as required or permitted by applicable local law;
 - To contact third party references provided by candidates to evaluate their previous performances.
 - Or as otherwise necessary in context of recruitment, work permit and immigration consulting activities.
 - Development of services: We may use your Personal Data to develop and improve our operational processes, websites and other related services. Where feasible, we use aggregated anonymous information in context of the development activities.
 - Legal and regulatory compliance, including obtaining and releasing Personal Data as required by law, judicial organizations or practice in order to comply with legal obligations imposed on us.

7. How do we transfer your Personal Data?

Vira international will not sell, lease or rent your Personal Data.

With Consent: Vira International may share your Personal Data if you have given your informed consent for Vira International to do so with the following:

7.1. Vira International global offices, authorised partners or third parties:

Vira International may share your Personal Data with other Vira International companies or authorised third parties who process Personal Data for Vira International for the purposes described in this Policy or otherwise provide recruitment related services to Vira International. In such cases Vira International will ensure that there is a genuine need to transfer your Personal Data.

Authorised third parties include, for example, recruitment agencies, professional advisors, external legal counsel, consumer credit reporting agencies, recruiting systems providers, and other third party suppliers.

Authorised third parties may technically have access to your Personal Data in the course of providing their services but will be contractually restricted from processing your Personal Data for



OISC Reference No:F200300063
Vyman House, 104 College Road, Harrow, Middx, HA1 1BQ
T: 02088635811
info@vira.co.uk | www.vira.co.uk
Company No. 4039493 |
VAT No. 802470658

other purposes. Vira International also requires them to act consistently with this Policy and to use appropriate security measures to protect your Personal Data.

7.2. International transfers of Personal Data:

Vira International is a global company that has affiliates, business processes, management structures and technical systems that cross national borders. This means that your Personal Data may be transferred across international borders to countries other than the one where you are applying to as an applicant. Such other countries do not always have equivalent laws providing specific protection for or rights in relation to Personal Data or they have different rules on privacy and data protection.

Vira International takes steps to ensure that there is a legal basis for such a transfer and that adequate protection for your Personal Data is provided as required by applicable law. Such steps include, for example, the use of standard agreements approved by relevant authorities and the requirement to use appropriate technical and organizational security measures to protect your Personal Data. By providing information to Vira International subject to this Policy, you consent to the transfer of your Personal Data as described in this section.

7.3. Mandatory disclosures:

Vira International may be required by or under mandatory law to disclose your Personal Data to certain authorities or other third parties, for example, to government agencies (e.g. the UK Home Office) responsible for the employment activities, statistical information or to the police or other law enforcement agencies, for example in context of conducting a background check

7.4. Mergers and acquisitions:

Where Vira International takes steps to sell, buy, merge or otherwise reorganize its businesses in certain countries, this may involve disclosing Personal Data to prospective or actual purchasers and their advisers. In such circumstances, Vira International will take all reasonable steps to ensure that appropriate measures to protect Personal Data are taken by such prospective or actual purchasers and their advisers.

7.5. Other:

Vira International may also disclose and otherwise process your Personal Data in accordance with applicable law to defend Vira International's legitimate interests, for example, in civil or criminal legal proceedings.

8. What steps are taken to safeguard Personal Data?

Data privacy, data protection and data security are pivotal considerations for Vira International. We have assigned specific responsibilities to address privacy and security related matters. We enforce our internal policies and guidelines through an appropriate selection of activities, including proactive and reactive risk management, security and privacy engineering, training and assessments. We take appropriate steps to address online security, physical security, risk of data loss and other such risks taking into consideration the risk represented by the processing and the nature of the data being

protected. Also, we limit access to our databases containing personal data to authorised persons having a justified need to access such information.

We have enlisted the services of: Brahm Consulting Ltd, GDPR Direct Ltd and Syng Ltd to provide a gap analysis and enforce good IT security practices within our operations.

9. Data Quality

We take reasonable steps to keep the personal data we possess accurate and to delete incorrect or unnecessary personal data. To the extent permitted or required by applicable local law or subject to your consent, we may use public sources in order to verify that Personal Data we hold is correct.

10. Your Rights

Even if we already hold your personal data, you still have various rights in relation to it. To get in touch about these, please contact us. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

10.1. Right to object:

If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.

10.2. Right to withdraw consent:

Where we have obtained your consent to process your personal data for certain activities (for example, for profiling your suitability for certain roles), or consent to market to you, you may withdraw your consent at any time.

10.3. Data Subject Access Requests (DSAR):

You have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or delete such information. At this point we may comply with your request or, additionally do one of the following:

- we may ask you to verify your identity, or ask for more information about your request; and
- where we are legally permitted to do so, we may decline your request, but we will explain why if we do so.

10.4. Right to erasure:

In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to "erase" your personal data. We will respond to your request within 30 days (although

we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply.

If we do agree to your request, we will delete your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. That way, we will minimise the chances of you being contacted in the future where your data are collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.

10.5. Right of data portability:

If you wish, you have the right to transfer your data from us to another data controller. We will help with this – either by directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format.

10.6. Right to lodge a complaint with a supervisory authority:

You also have the right to lodge a complaint with your local supervisory authority.

There may be certain categories of information prescribed by applicable local law that Vira International may lawfully withhold. If Vira International declines to provide access to any of the Personal Data you request, you will be provided with the reasons for such a decision.

In case you revoke your consent or object to certain processing activities or delete your profile with us completely, Vira International may be unable to continue the recruitment process with you.

11. Whom to contact?

Vira International Ltd is the controller of your Personal Data. If you have any queries about your Personal Data, contact primarily the relevant recruiting personnel through provided contacts or channels.

If you want to exercise your rights as described in the previous section of this Policy you may make a request in writing through provided contacts or emailing: dpo@vira.co.uk

Vira International may need to identify you and to ask for additional information to be able to fulfil your request. Vira International will fulfil your request within the timeframes required by applicable local law or, in the absence of such timeframes, within a reasonable time.

You may also contact Vira International if you have any queries concerning Privacy matters. Such queries and concerns may be made or reported in writing to the below address:



OISC Reference No:F200300063
Vyman House, 104 College Road, Harrow, Middx, HA1 1BQ
T: 02088635811
info@vira.co.uk | www.vira.co.uk
Company No. 4039493 |
VAT No. 802470658

12. Changes to this Policy

Vira International may from time to time change, modify this policy at any time with or without notice. However, if this Policy is changed in a material, adverse way, Vira International will post a notice advising of such change at the beginning of this Policy and on Vira's website home page for 30 days. We recommend that you re-visit this Policy from time to time to learn of any such changes to this Policy.

This policy is reviewed as part of the ongoing Information Security Management System (ISMS) process by the Vira International Security Steering Group (SSG).