

# Privacy policy

We collect information about you to make your job search as easy and safe as possible. This data is important; we understand that. This is why we're committed to protecting your privacy online.

[HP Entity 1, HP Entity 2, HP Entity 3 and their respective offices, branches and related companies are engaged in international human recruitment consulting services and business consulting services and are together referred to as ("Hire Pundit", "we", "our" or "us").

We are committed to protect and use your personal information in accordance with Japan Privacy Principles under the Act on Protection of Personal Information, (APPI) and our information privacy policies. In addition, we maintain the appropriate technical and organizational measures to protect your personal information against unauthorized or unlawful processing and/or against accidental loss, alteration, disclosure or access, or accidental or unlawful destruction of or damage thereto.

The term "Personal Information" in this Privacy Policy means any information from which your identity is apparent or can be reasonably ascertained.

## 1. Collection of Personal Information

We collect personal information of our employees, potential employees, clients, suppliers, business contacts, and website users.

Hire Pundit may collect information about you (collectively your "personal information") such as your name, contact details, skills, qualifications, accreditations and your employment history. We may also collect other types of your personal information such as references and employment objectives during the course of dealing with you, for example if you are considered for a particular employment position. The purpose for which we collect personal information and the consequences of not providing it will be made clear at the time of collection.

We may collect personal information when you:

- (a) register or subscribe to our services or request further services on our website;
- (b) contact us to report a problem with our websites or make any enquiry or query or comment; and
- (c) you apply online for a job or work with Hire Pundit, you may need to provide (without limitation) information about your education, employment history and accreditations. Your application will constitute your consent to our use of this information to access your application and to allow us to carry out any reference checking and other related activities as may be required of us under applicable law as an employer.

Hire Pundit may also collect information from public record and third parties.

Your decision to provide any personal information to us is voluntary. You will therefore not be subject to adverse consequences if you do not wish to provide us with your personal information. However, please note that if you do not provide certain information, we may not be able to accomplish some or all

of the purposes outlined in this Privacy Policy, and you may not be able to use certain tools and systems which require the use of such personal information.

If you provide us with personal information of another person (for instance, a potential employee/referral), you are responsible for ensuring that such person is made aware of the information contained in this Privacy Policy and that the person has given you his/her consent for sharing the information with Hire Pundit.

Sometimes our activities require us to collect sensitive information. For more details, see the section 'Sensitive information' below.

## **2. Use and Disclosure of Personal Information**

Hire Pundit will hold, use, disclose and otherwise process your personal information for the purposes as disclosed to you at the time of collection of your personal information, or otherwise as set out in this Privacy Policy.

We will not use or disclose your personal information for any other purpose without first seeking your consent, unless authorised or required by law. Generally, we will only hold, use, disclose and otherwise process your personal information for the following purposes:

- (a) to provide our services to you;
- (b) to maintain our business relationship, where you are a user of our website, a client or candidate;
- (c) to enable you to submit your CV generally, to apply for specific jobs or to subscribe to our services (Job Alerts or Newsletters);
- (d) to match your coded details with job vacancies, to assist us in finding a position that is most suitable for you and to send your personal information to clients in order to apply for jobs;
- (e) to provide clients with information about you during an assignment or placement, including qualifications, licenses, checks (including sensitive information checks, where you have consented), migration status and other personal information you have provided to us;
- (f) to contact any reference from details provided by you for the purpose of Hire Pundit placing you with a client;
- (g) to answer your inquiry;
- (h) to direct-market products and services, advise you of news and industry updates, events, promotions and competitions, reports and other information. Where we do so, you will be able to unsubscribe from such communications;
- (i) to different parts of the Hire Pundit worldwide to enable the development and marketing of other products and services and to improve our customer service and to make our services more valuable to you, including tailoring our website when you log on to make it relevant to you personally;

(j) to trusted third parties where we have retained them to provide services that you have requested, such as psychometric evaluations or skills tests, and who also provide services to us, such as professional advisers, IT consultants, mailing houses and function co-ordinators. These third parties must comply with similar undertakings of privacy and confidentiality as Hire Pundit;

(k) if Hire Pundit merges with or is acquired by another business, we may share personal information with the new owners of the business and their advisers and if this happens, you will be sent notice of such an event;

(l) we may also release personal information to regulatory or law enforcement authorities, if they require us to do so;

(m) to meet or comply with any legal, regulatory or statutory requirements relating to our provision of products and services and to make disclosure under the requirements of any applicable law, legislation, rule, ruling, regulation, direction, court order, by-law, guideline, circular or code (collectively "laws") applicable to us;

(n) for research, benchmarking and statistical analysis; and

(o) we may also seek your consent to collect, hold, use and disclose your personal information for any other purpose not listed above or permitted under the privacy laws or other applicable laws

### **3. Sharing of Personal Information**

While your personal information will be kept confidential, in certain circumstances, it may be necessary for us to provide or disclose your personal information if required for any of the foregoing purposes. Where we do so, we would merely disclose information that is necessary for the purpose of such disclosure.

We may share your personal information with the following categories of persons (who may be located within or outside Japan), such as entities within the Hire Pundit including all related companies, subsidiaries, holding companies and associated companies, our affiliates, licensees, joint venture partners; our sub-contractors and service or product providers in connection with our products or services; and anybody or person to whom we are compelled or required to do so under any laws or in response to any competent or government, state, provincial, local government, statutory or municipal authority, industry regulators, law enforcement authority, agency or body.

We do not sell or license your personal information to third parties.

### **4. Sensitive Information**

**We do not generally seek to collect sensitive information (also known as special categories) through this site or otherwise. In the limited cases where we do seek to collect such information, we will do this in accordance with information privacy law requirements and/or ask for your consent.**

**Sensitive information is a special category of personal information under the APPI** It is the information or an opinion about you, including racial or ethnic origin, political opinions, membership of a

political association, religious beliefs or affiliations, personal social status, philosophical beliefs, or the fact that the individual is a victim of a crime, criminal records and health information.

## **5. Privacy on Our Websites**

### **(a) Submitting Your Curriculum Vitae ("CV") and Applying for Jobs**

You may submit your CV to Hire Pundit via this website, either for general consideration by our recruitment consultants for positions as they arise or to apply for a specific advertised job. Once submitted, your CV will be sent directly to the relevant Hire Pundit recruitment consultant who will review your details and advise you whether you are to be accepted by us for registration on our central information base. This information base, including your personal information, can be accessed by any of our recruitment consultants working in other offices of the Hire Pundit, both inside and outside Japan. If you are accepted onto our information base, our recruitment consultants should then contact you to set up an interview in person. You can update your CV at any time, simply by following the same procedure to submit a new CV via our websites.

### **(b) Job Alerts**

You may sign up to receive emails that alert you to new jobs on our website (Job Alerts). To subscribe to Job Alerts, you need to provide your email address, which will be used for the purpose of keeping you informed by email of the latest jobs and/or news in your nominated industry. If you no longer wish to receive Job Alerts, unsubscribe links are provided in every Job Alert email that you receive.

### **(c) Aggregate Information About Website Visitors**

We gather information and statistics about all visitors to this and all of our websites worldwide, including the most frequently accessed pages and most frequently used services. We only use such information in aggregate form (that is, the information does not identify any one individual). This information helps us determine the most beneficial parts of our websites and ways in which we can continually improve our online services to create a better overall experience for our users. We also publish some of this aggregate (non-identifiable) information on the Hire Pundit websites worldwide.

## **6. Information Transfer Across International Borders**

Hire Pundit companies operates globally and certain aspects of Hire Pundit infrastructure are centralised including information technology services provided to such companies. In addition, our services (to clients) may span more than jurisdiction, certain information will be accessed by all those within the Hire Pundit organisations. Therefore, your personal information may be shared and transferred and stored outside of the country which you are located. This includes countries outside of European Economic Area (EEA) and countries with laws that have not necessarily been determined to provide adequate level of protection for the processing of personal data under the laws of EU or other jurisdictions.

We have taken appropriate and legal precautions to safeguard the safety and integrity of personal information that is transferred within the Hire Pundit organisations. In addition, we have in place an intra-group information transfer agreement containing model clauses approved by the European Commission which permit cross-border transfers of personal information from within the EEA to third

countries outside the EEA, (as information protection laws outside the EEA may not provide an equivalent level of protection to EEA information protection laws), ("Model Clauses"). If you would like a copy of the Model Clauses, please contact us.

Where we need to transfer personal information from any Hire Pundit company outside the EEA to another Hire Pundit company outside the EEA for the purposes set out above, we will comply with any local law transfer requirements.

## **7. Security of Personal Information**

Hire Pundit maintain organizational, physical and technical security arrangements for all the personal information we hold. We have protocols, controls and relevant policies, procedures and guidance to maintain these arrangements taking into account the risks associated with the categories of personal information and the processing we undertake.

The ways we do this include:

- (a) limiting physical access to our premises;
- (b) limiting access to the information we collect about you (for instance, only those of our personnel who need your information to carry out our business activities are allowed access;
- (c) requiring any third-party providers to have acceptable security measures to keep personal information secure; and
- (d) putting in place physical, electronic, and procedural safeguards in line with industry standards.

## **8. Retention of Personal Information**

We will retain your personal information only for as long as is necessary. We maintain specific records management and retention policies and procedures, so that personal information is deleted after a reasonable time according to the following retention criteria:

- (a) we retain your information as long as we have an ongoing relationship with you (in particular, if you have an account with us);
- (b) we will only keep the information while your account is active or for as long as needed to provide services to you;
- (c) we retain your information for as long as needed in order to comply with our global legal and contractual obligations.

If we no longer require your personal information and are not legally required to retain it, Hire Pundit will take reasonable steps to destroy or permanently de-identify the personal information.

## 9. Website Links

Where we have links to websites outside the Hire Pundit, we cannot ensure that your privacy will be protected in accordance with this policy. You should consult these other websites' privacy policies as we have no control over them and are not responsible for any information that is submitted to or collected by these third parties.

## 10. Privacy Rights

You may request access to or update or to delete your personal information held at Hire Pundit by contacting the Hire Pundit Privacy Officer as set out below. We may ask to verify your identity and for more information about your request. Where we are legally permitted to do so, we may refuse your request and give you reasons for doing so. Where you request your personal information to be updated and there is a dispute about the facts, we will make a note on your personal information of such dispute. If you have created an account with Hire Pundit via our website, you are able to view and update any information by logging into your account.

You may also request that Hire Pundit stops using your information and contacting you by withdrawing your consent and we will comply with your request (for example if at any time you would prefer to stop receiving newsletters and updates from us, please use the "unsubscribe" option included in the email or other material). However, if this involves a request for deletion of your file, please be aware that we may not be required or able to do so, particularly where your file also holds information about our clients. We reserve the right to charge an administrative fee for access and updating requests.

## 11. Complaint

**At Hire Pundit we aim to acknowledge receipt and resolve complaints as soon as possible. However, there may be instances where this is not possible due to the contents of the complaint. In such circumstances, we will respond to your complaint in a reasonable and practical time.**

## 12. Contact

You can contact our Privacy Officer if you would like further information, have comments about this Privacy Policy or any question or complaint on any privacy issue.

[info@hirepundit.com](mailto:info@hirepundit.com)

## 13. Changes to this Privacy Policy

Please note that this Privacy Policy will regularly be updated to reflect any changes in the way we handle your personal information or any changes in applicable laws. We suggest that you visit our website regularly to keep up to date with any changes.