

GDPR readiness at eFinancialCareers

Our Responsibilities and
the General Data Protection
Regulation

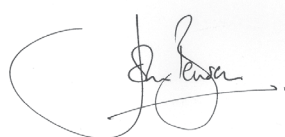
25 May 18

GDPR Enforcement Date

A word on privacy

eFinancialCareers places data privacy at the heart of what we do. We fully welcome the EU General Data Protection Regulation (GDPR) and it's aims to provide greater control to individuals over their personal data, along with enhancing greater transparency as to how this information is used.

I invite you to review the information below and return to this page for ongoing updates on our GDPR compliance.



John Benson

Privacy is important to us



At eFinancialCareers we are carrying out a range of updates to our products, services, email capture and data storage, along with a policy review to ensure our services are fully aligned with the General Data Protection Regulation (GDPR).

Our dedicated project team are responsible for ensuring that we continue to protect the personal data of clients and professionals who use our services by identifying the changes required for our business.

- [More about GDPR and frequently asked questions >>](#)
- [How eFinancialCareers is preparing for GDPR compliance >>](#)

FAQs about GDPR



What is GDPR?

The General Data Protection Regulation (GDPR) is a European Union Regulation which comes into effect on 25 May 2018. It replaces the Data Protection Directive 95/46/EC and is designed to harmonise data privacy laws across Europe, to protect and empower all EU citizens data privacy and to reshape the way organisations across the region approach data privacy.

Who is affected by the GDPR?

In relation to eFinancialCareers, persons affected by the GDPR are those EU citizens whose personal data is being collected and utilised in our business. Parties include job-seeking candidates who registered themselves on our service, active and inactive employers who use or have used eFinancialCareers services, prospective employers who have not previously used our services but may do so in the future, and our EU based employees.

What types of information are defined as “personal data”?

“Personal data” is defined as any information relating to an identified or identifiable natural person (also called a “data subject”). Such data may include personal identifiers like a name, location, links to online presence, contact information such as phone numbers or email addresses, or photos.

How should companies communicate with individuals about their data protection?

Organisations need to ensure they use simple language when asking for consent to collect personal data, they need to be clear about how they will use the information, and they need to understand that silence or inactivity no longer constitutes consent.

The GDPR requires all organisations collecting personal data to be able to demonstrate the legal basis upon which they are processing personal data - be that based on contractual necessity, legitimate interest or where Consent is the basis - to prove clear and affirmative consent to process that data.

What rights do individuals have under GDPR?

Most of these rights below are already covered under existing data protection laws and the GDPR has put renewed emphasis on them.

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to be forgotten
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling

For a more detailed explanation and information about GDPR, visit the website <https://www.eugdpr.org/> or the Information Commissioner's Office website <https://ico.org.uk/>

We're prepared

What are we doing at eFinancialCareers to prepare for GDPR?

In line with the transparency principles of GDPR, we are making changes so that:

- Information is communicated in a clear way that is understood by professionals and clients who use our services
- We clearly demonstrate how we collate and store personal data
- The data we hold is easily accessible should we be asked to provide evidence to processing data in compliance with GDPR
- Professionals who create a profile can choose whether they are searchable and can be found by recruiters from our database
- It is clear from all email capture that professionals know what they are consenting to and how their personal data will be shared
- We are asking clients to opt into marketing communications and newsletters
- When we capture opt-in information we can show when it was captured and for which communication, and store that information effectively

What is eFinancialCareers' data minimisation policy?

We will only hold personal data that is necessary to provide the services found on eFinancialCareers. Any personal data that is not required will either be anonymised to make it non-personal or it will be deleted.

What is eFinancialCareers' data retention policy?

We are updating the periods for which we hold data. Once any personal data reaches the appropriate data retention period it will either be deleted or made non-personal via anonymisation. For job-seeking professionals who registered themselves on eFinancialCareers, personal data is kept for five years and then deleted. For employers on eFinancialCareers, personal data is kept for ten years, and efforts are made to delete as much information as possible while still maintaining sufficient data for audit, legal, and tax requirements.

How does eFinancialCareers share personal data?

We will only share personal data when we have the necessary right to do so. For instance;

Professionals & candidates

- Resume profiles which contain information provided to eFinancialCareers including; contact information, work history, skills, references, or other employment data
- Resume profiles made searchable on our candidate database
- When applying for a job via a job posting listed by one of our registered employers
- If a candidate has opted-into receiving promotional materials from third parties, information may be made available to these third parties who provide goods or services that we believe may be of interest to you

Employers & recruiters

- Information displayed on job postings is shared with prospective candidates
- Personal data from employers beyond what is seen on job postings is not shared, and only used internally

How can I check on the status of my personal data on eFinancialCareers?

Candidates have the ability to download all of the information that eFinancialCareers holds on them. For any queries, please contact us at gdpr@efinancialcareers.com

How do we gather data from professionals at eFinancialCareers?

We only gather our data from candidates who register on our site whereby they provide consent for the use of their personal data.

What does GDPR mean for professionals?

Email preferences:



- All emails are opted-out by default for any users in Europe so users must expressly opt in to email communications from eFinancialCareers. It should be noted that users were never opted in to email communications without their knowledge; our best practise always provided the option of un-ticking the email opt in boxes. Information is communicated in a clear way that is understood by professionals and clients who use our services

eFinancialCareers Newsletter
The latest news, analysis and advice you need to advance your career

eFinancialCareers Communications
Recieve the latest jobs and companies hiring that are relevany to you and find out what's new at eFinancialCareers, including products and site announcements (occasional)

Sponsored Communications
Communications about job openings, events and other opportunities from select partners and hiring companies (occasional)

- All messaging and system emails are updated to ensure absolute clarity for users on what they are opting into, what happens to their personal data and to make sure that we are not 'marketing' to users who have not opted in to other communications

Are your profile privacy settings up to date? X

We want to make sure your profile privacy settings are up to date. Please confirm or update your settings using the options below.

Searchable
Your profile is visible to recruiters actively searching on eFinancialCareers

Searchable but anonymous
Your profile is visible to recruiters actively searching on eFinancialCareers but all your contact details are hidden

Non-searchable
Your profile is not searchable, it is invisible to recruiters and you won't receive any profile views

Learn More
Confirm

Searchable:

- In advance of May 2018, all finance professionals will be asked to opt-in to be searchable on our database
- The default option for finance professionals who have created a profile will be unsearchable
- Since September we have been displaying a message after candidate login to ensure users know if their candidate profiles are searchable in our candidate database or private

Continued...

What does GDPR mean for professionals?



Job applications:

When applying for jobs, finance professionals will clearly be asked whether they consent to sharing their details



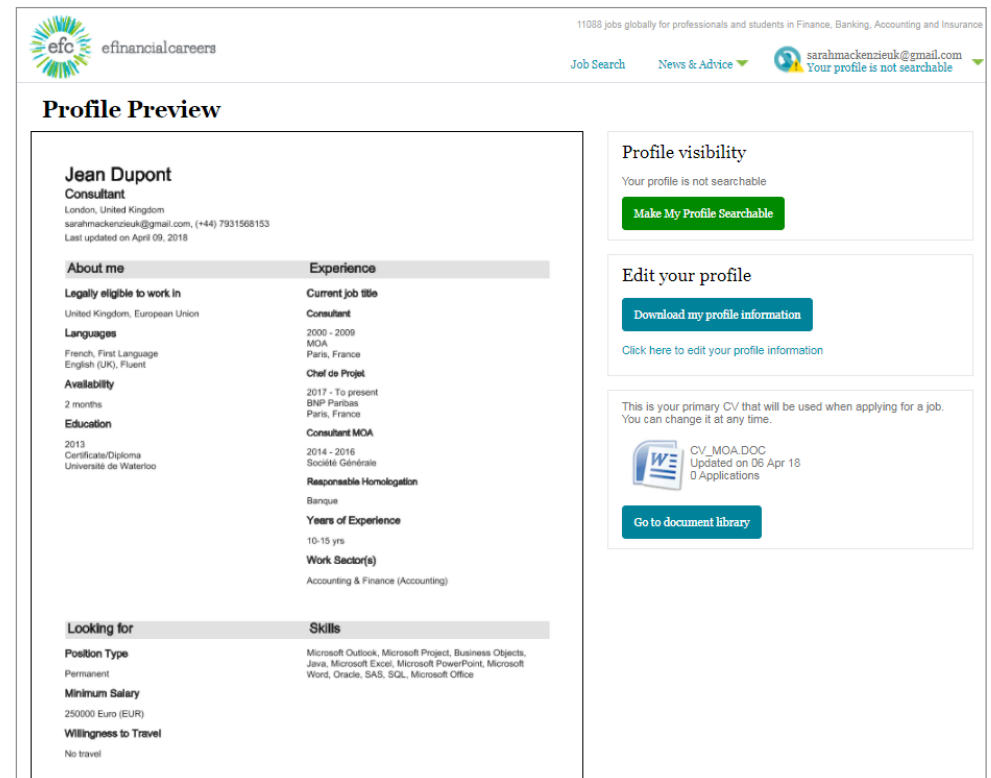
Sponsored communications:

Sponsored communications and job alerts, have always been express opt in and as such these services are already GDPR compliant



Transparency:

- We have given candidates the ability to view and download all the information that they have provided to us so that they have one clear and portable view of their data
- We now capture date and time stamps against any opt ins on our site – either email or becoming searchable in our candidate database. This allows us to prove exactly when a user opted in (or out) of email communications or being searchable
- eFinancialCareers has always had an account deletion option for candidates, but we will offer both a disable and a full hard delete option from April



The screenshot shows a user profile for Jean Dupont, a Consultant. The profile includes sections for 'About me', 'Experience', 'Languages', 'Availability', 'Education', 'Looking for', and 'Skills'. On the right side, there are three main sections:

- Profile visibility:** A message states 'Your profile is not searchable' with a green button labeled 'Make My Profile Searchable'.
- Edit your profile:** A blue button labeled 'Download my profile information' and a link 'Click here to edit your profile information'.
- CV Management:** A message states 'This is your primary CV that will be used when applying for a job. You can change it at any time.' Below this is a document icon for 'CV_MOA.DOC' (Updated on 06 Apr 18, 0 Applications) and a blue button labeled 'Go to document library'.

What does this mean for our clients?

- Firstly, clients should review their own practices and Privacy Policies. More information can be found here www.eugdpr.org/ or the Information Commissioner's Office website www.ico.org.uk/
- To meet our obligation as a data processor, a weekly report will be sent to clients detailing candidates who have chosen to remove themselves from our database. This will help recruiters meet their responsibility to identify and remove any such candidates from their own systems
- Our revised data retention policy for eFinancialCareers will now store candidate data for five years since their last log in to the platform
- Clients now have the ability to add a link to their own privacy policy in the job posting process so that candidates can view these at the point of applying for roles. We recommend that clients add a questionnaire to their job postings to ensure that candidates have reviewed privacy policies before they apply for any roles
- We will be updating our data security policies and procedures along with a new escalation process in the event of any kind of breach
- The eFinancialCareers Terms of use will be updated



Benefits of GDPR

- An audience and candidate pool that have expressly chosen to be contacted and are therefore a more engaged audience
- The candidate data available is assured to be accurate and up to date
- Personalised and more efficient recruitment marketing by utilising email preference centres
- A more effective data-driven marketing approach that can help deliver more appropriate, personalised, timely communications to candidates