

## Privacy Policy

This privacy notice discloses the privacy practices for [www.anptyss.com](http://www.anptyss.com)

### Information Collection, Use, and Sharing

- We are the sole owners of the information collected on this site. We only have access to/collect information that you voluntarily share with us via email or other direct contacts from you. We will not sell or rent this information to anyone.
- We will use your information to respond to you, regarding the reason you contacted us. We will not share your information with any third party outside of our organization.
- Unless you ask us not to, we may contact you via email in the future to tell you about specials, new products, services or changes to this privacy policy.

### Your Access to and Control over Information

You may opt out of any future contacts from us at any time. You can do the following by contacting us via the email address given on our website.

- Change/correct any data we have about you.
- Have us delete any data we have about you.
- Express any concern you have about our use of your data.

### Security

- We take precautions to protect your information. When you submit sensitive information via the website, your information is protected both online and offline.
- The computers/servers in which we store personally identifiable information are kept in a secure environment.
- If you feel that we are not abiding by this privacy policy, you should contact us immediately via [info@anptyss.com](mailto:info@anptyss.com)

## GDPR

Your privacy is important to us. We are transparent about the processes we deploy to collect and use information to keep your data secure and to provide you with deciding options. Our Privacy Policy is designed to help you understand what information we collect, why we collect it and what we do with it.

### Information collection and use

At Anatyss Pvt Ltd., we collect certain categories of information depending on the relationship we have with you. You provide most of this data directly:

### Recruitment purposes

We collect the information you provide us when applying for an open position via our website or through our other channels. We do sourcing through various job boards or LinkedIn where your details are available. We send a Consent email to you to represent your candidature and retain your data for further job openings. You can allow or deny us the permission. Your application letter and curriculum vitae will be retained for 6 months after the recruitment procedure ends. After that, we will delete your information unless we get your permission to hold on to the information for future jobs within our company or with clients. In that case we will delete the information after 1 year. **Any given permission can be withdrawn at any time by sending an email to [info@anatyss.com](mailto:info@anatyss.com).** If you apply for a position with one of our clients, we will share your information with them.

### Data that we process

- Personal details – Name, Age/date of birth, gender, marital status, nationality/citizenship/place of birth, copy of your driving license and/or passport/identity card, social security number (or equivalent in your country)
- Communication details – Address, contact number, emergency contacts and details
- Competences, skills, experience and education – Education details and employment history
- Other information relevant to roles and relevant industry news – Immigration status (whether you need a work permit), start date or availability date, details about your previous and current remuneration, pensions and benefits arrangements, any other tax-related information
- Other information such as that found from public sources on your interests and needs regarding future employment, both collected directly and inferred, for example from jobs viewed or articles read on our website or from links clicked on in emails from us
- Please note that the above list of categories of personal data we collect is not exhaustive. To the extent that you access our website or click through any links in an email from us, we will also collect certain data from you.

### Employment purposes

We collect the information you provide to us in order for us to fulfil our side of the agreement under which you have become an employee. This processing is necessary to perform the contract between you and us. The data we collect can include the following: name and contact data, credentials, bank information, ID, national security number, and any other necessary information needed to process

payroll. Depending on the type of data, we can retain it for up to 7 years after the employment ends. The exact period will be based on what is prescribed by law.

## Services purposes

We collect the information you provide to us needed to execute our duties as agreed upon in the business agreement we both signed. This processing is necessary to carry out the contract between you and us. When you use services that require your financial information or to complete transactions, we may collect your payment and billing information in order to provide you with those services. Your information will be retained for as long as the contract is in place, and longer if necessary for legal obligations.

## Your rights and how to exercise them

You have the right to view or ask for changes to your information available with us. You might also have the right to restrict or limit the information available with us.

The GDPR provides you with the following rights to:

- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal details. This enables you to ask us to delete or remove personal information where there is no good reason for us to continue processing it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing.
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing it. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal details. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party in certain formats.
- The right to be informed.
- The right to be forgotten.
- The right to object to automated decision-making.

You can request that we delete your information, and we will carry out this request unless certain exceptional reasons arise permitting Anptyss Pvt Ltd. to keep certain information about you, for example: a legal obligation, disputes and to enforce our agreements.

You also have the right to obtain a copy of your information in an easily accessible format. In certain circumstances, you can restrict some of your information that we transfer to third parties. Anptyss Pvt Ltd. will help you exercise these important rights. **If you want to exercise your rights, please send an email at [info@anptyss.com](mailto:info@anptyss.com) stating your request.**

## Information collected through third parties

We also obtain data from third parties. We protect data obtained from third parties according to the practices described in this statement, plus any additional restrictions imposed by the source of the data. These third-party sources vary over time, but have included:

- Publicly available sources (LinkedIn, corporate websites, job board websites, online CV libraries)
- Personal recommendations
- Existing relations (Vendors)

In this case we will inform you by sending you this privacy notice, within a maximum of 30 days of collecting the data, of the fact that we hold personal data about you, the source the personal data originates from and whether it came from publicly accessible sources, and for what purpose we intend to retain and process your personal data.

## How we use the information collected

Our contractual requirements to use your personal data are:

- If you are a candidate, we have a legitimate interest in using your personal data for the purposes of processing your job application and sharing it with potential clients.
- If you're an Anaptyss Pvt Ltd client, it is a requirement that we collect personal information from you so that we can enter into a contract with your business entity.
- If you're an employee (or temporary or contract worker) at Anaptyss Pvt Ltd, we have a legitimate interest in using your personal data for payroll, taxation, pension and benefits. We use our legitimate interests as the lawful basis for processing your data, which is why we don't ask for your consent to process it.

We mainly rely on two separate bases to lawfully process your information.

1. In accordance with an agreement (including our Terms & Conditions)
2. Based on your given consent

Occasionally, Anaptyss Pvt Ltd. may have to rely on other legal bases to process your information, for example to comply with a legal obligation.

## How we share this information

We may use and disclose personal information about you for the purpose of assisting you in your job search. We may disclose personal information to potential employers, nominated referees; any person or body we are required to disclose to by law; to past educational organizations to verify qualifications and to competent organizations that conduct background and/or criminal record checks (so long as the entity undertakes to comply with privacy laws and keeps all supplied information confidential); any information stored may also be shared with our bank and financier.

We will share information with companies, organizations or individuals outside of Anaptyss Pvt Ltd. when we have your consent:

- Within Anaptyss Pvt Ltd.:

Information may be shared within Anaptyss Pvt Ltd., including with other Anaptyss Pvt Ltd. and affiliates. Anaptyss Pvt Ltd. affiliates may use the information in a manner consistent with our privacy policies.

- With our clients:

The nature of our services demands that we share personal data with our clients. This means that we share CV and motivational letters for recruitment purposes, data necessary to fulfil an agreement. Not all of our clients are located within the EU/EEA and, for those outside, appropriate safeguards have been put in place to comply with the GDPR (see also “Transferring data outside the EU/EEA”).

- Trusted local service partners:

We provide user information to trusted partners who work on behalf of Anaptyss Pvt Ltd. based on our directions and in compliance with appropriate confidentiality measures. Consent will be taken before sharing details with vendors (i.e. payroll providers, background verification companies etc.).

- For legal purposes:

We may access, preserve and disclose information to investigate, prevent or take action in connection with:

- (i) Legal processes, and legal and governmental agency requests;
- (ii) Enforcement of the Terms;
- (iii) Requests for customer service;
- (iv) Establishing or exercising our legal rights or defending against legal claims; or

- As otherwise required. This may include responding to lawful governmental requests.

## **Data Security and Protection Principles**

Anaptyss Pvt Ltd. uses a variety of security technologies and procedures to help protect your personal data from unauthorized access, use or disclosure. We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. We store the personal data you provide on computer systems that have limited access and are in controlled facilities. When we transmit highly confidential data over the internet, we protect it through the use of encryption. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Anaptyss Pvt Ltd. will comply with data protection laws and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent manner
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- Relevant to the purposes we have informed you about and limited to only those
- Accurate and kept up to date
- Kept only as long as necessary for the mentioned period

## Data Retention

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate business interests and that you are happy for us to do so. Accordingly, we will re-assess our 'Legitimate Interests Needs Balancing Act' on an annual basis and run data routines to remove data that we no longer have a legitimate business interest in maintaining.

We segregate our data so that we keep different types of data for different time periods. The criteria we use to determine whether we should retain your personal data includes:

- The nature of the personal data
- Its perceived accuracy
- Our legal obligations
- Whether an interview or placement has been arranged
- Our recruitment expertise and knowledge of the industry by country, sector and job role

Your personal details, including your name, e-mail address and resume, are held and used by us for the following purposes:

- For keeping you informed of Anaptyss Pvt Ltd, news and wider developments in your chosen field
- For tailoring the version of our website you see when you log on to make it relevant to you
- For compiling salary and other surveys of our candidates

## Transferring data outside the EU/EEA

Anaptyss Pvt Ltd. may process information related to individuals in the EU/EEA and may transfer that information from the EU/EEA through various compliance mechanisms, including data processing agreements based on the EU/EEA Standard Contractual Clauses.

We ensure to have the best practices in place to avoid any misuse or breach of Data. We have best in class security procedures in place to ensure data safety.

To the extent that Anaptyss Pvt Ltd. is deemed to transfer information about you outside the EEA, Anaptyss Pvt Ltd. relies separately, alternatively and independently on the following legal bases to transfer your information:

- Standard contractual clauses

The European Commission has adopted standard contractual clauses that provide safeguards for personal data that is transferred outside the EEA. We use these clauses where possible when transferring personal data outside the EEA including to our affiliates.

## **Final note**

This Privacy Policy applies only to Anaptyss Pvt Ltd. and its affiliates. This Privacy Policy does not apply to the practices of companies that Anaptyss Pvt Ltd. does not own or control, or to people that Anaptyss Pvt Ltd. does not employ or manage. If your data is shared with any third party, separate consent is taken for the same.

We may amend or update this Privacy Policy from time to time. We will inform you when and what changes are made.

If you have questions or suggestions relating to your information or wish to make a complaint, please contact us at:

**Email: [info@anaptyss.com](mailto:info@anaptyss.com)**