

PRIVACY NOTICE

Vertex Consulting Group Holdings Limited

Key details

Policy prepared by:	Becky Cook
Approved by board / management on:	01.06.2025
Policy became operational on:	01.06.2025

This Privacy Notice applies to data subjects in both the European Union (EU) and the United Kingdom (UK). Vertex Consulting Group Holdings Limited (“Vertex”) complies with the General Data Protection Regulation (EU) 2016/679 (“EU GDPR”) and the United Kingdom General Data Protection Regulation (“UK GDPR”), as amended by the Data Protection Act 2018 and subsequent reforms. Where this policy refers to “GDPR,” it should be read as applying to both the EU and UK GDPR, except where otherwise specified.

VERTEX CONSULTING GROUP HOLDINGS LIMITED (“Vertex”) is consultancy business providing talent solutions to clients and work progression services to work-seekers. Vertex must process personal data (including sensitive personal data) so that it can provide these services – in doing so, Vertex acts as a data controller.

You may give your personal details to Vertex directly, such as on an application or registration form or via our website, or we may collect them from another source such as a jobs board or Consent request. Vertex must have a legal basis for processing your personal data. For the purposes of providing, you with work-finding services and/or information relating to roles relevant to you, we will only use your personal data in accordance with the terms of the following statement.

You can also find here: [Polish Privacy Policy](#)

Please read the Policy carefully. By entering or using a website belonging to Vertex and sending us any Personal Data in connection with job applications, recommending a friend to work, sending a request for an offer / cooperation, etc. the user accepts the terms of this Policy and confirms that he/she has read its content.

Terms used in the Privacy Policy

Personal data - defined as Personal data within the meaning of the GDPR, i.e. all information relating to an identified or identifiable natural person. These data identify directly or indirectly a natural person with regards to the name, e-mail address or telephone number of the natural person and other data that, in connection with the above-mentioned, may identify the User.

GDPR - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46 / EC (general Data Protection Regulation), pursuant to which Vertex holding and its Subsidiaries process Users' Personal Data.

VERTEX CONSULTING GROUP HOLDINGS LIMITED C/O Hillier Hopkins LLP First Floor, Radius House, 51 Clarendon Road, Watford, United Kingdom, WD17 1HP

Specialist - a job candidate offered by Vertex to its customers.

Subsidiaries - a company or entity that is directly or indirectly controlled by Vertex, where "control" means: (a) in the case of corporate entities, direct or indirect ownership of more than fifty percent (50%) of stocks or shares entitled to vote, or (b) in the case of non-corporate entities, holding directly or indirectly more than fifty percent (50%) of the equity with the power to direct such non-corporate entities. The subsidiary companies are, in particular:

VERTEX SOLUTIONS SPÓLKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ

Vertex Solutions International

Vertex Solutions Inc

VERTEX SOLUTIONS INTERNATIONAL, SOCIEDAD LIMITADA

Vocabulo Vaporoso unipessoal LDA

Vertex Solutions International Ltd

Vertex Agility Ltd

Vertex Agility Brazil LTDA

Solvex Solutions LLP

Vertex Agility - FZCO

Vertex Solutions International S.R.L

Vertex Solutions Consultancy BV

Vertex Solutions International SRO

VERTEX AGILITY FZCO

Vertex Solutions Cyprus Ltd

Vertex Solutions International

VERTEX CONSULTANCY BILGI TEKNOLOJILERI VE DANISMANLIK TICARET LIMITED SIRKETI

Vertex Agility Philippines Inc.

Vertex Agility SAS

Vertex Solutions Lux Sarl

V-Agility Private Limited

Vertex Solutions International Ltd

Vertex Agility Limited Liability Company

User - job candidate, newsletter subscriber, person asking a question, training participant, person recommending a friend to work and visiting websites belonging to Vertex, as well as a person with a job offer which was presented and accepted by other means, **such as** LinkedIn, etc.

Services - services provided by Vertex electronically, via the website, i.e. : subscribing to the newsletter, sending inquiries via the contact form, sending documents necessary in the recruitment, vetting and backgroundcheck processes (as applicable), application for participation in training, creation of an account on the candidate portal for timesheet filing.

UK GDPR Addendum

Vertex Consulting Group Holdings Limited ("Vertex") is committed to complying with the UK GDPR, as amended by the Data Protection Act 2018 and subsequent reforms effective in 2025. The following provisions apply specifically to the processing of personal data of individuals in the United Kingdom and supplement the main body of this Privacy Notice.

1. Legal Bases for Processing under UK GDPR Reforms

- Under the UK GDPR reforms, the legal basis of ‘legitimate interests’ has been broadened. In certain cases, Vertex may rely on legitimate interests for processing personal data without the need for a balancing test, including for:
 - Direct marketing to existing customers
 - Intra-group administrative purposes
 - Network and information security
 - Fraud prevention and detection

2. International Data Transfers from the UK

- For personal data originating in the UK and transferred outside the UK, Vertex uses the International Data Transfer Agreement (IDTA) and/or the UK Addendum to the EU Standard Contractual Clauses (SCCs), as approved by the UK Information Commissioner’s Office (ICO). All relevant contracts have been updated to reflect these requirements.

3. Data Processing Agreements

- *All contracts with data processors include Data Processing Addenda that meet the requirements of both the EU and UK GDPR, including detailed instructions, confidentiality, security measures, audit rights, and rules for international data transfers*

4. Cookies and Direct Marketing Consent

- Vertex applies the UK’s updated rules on cookies and direct marketing, which allow more flexibility for obtaining consent, while maintaining transparency and respecting user preferences.

5. Data Subject Rights and Supervisory Authority

- UK data subjects have the same rights as under the EU GDPR (see “Your Rights” section below).
- *If you are located in the United Kingdom, the Information Commissioner’s Office (ICO) is the relevant supervisory authority.
Website: <https://ico.org.uk>
Telephone: 0303 123 1113
Address: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF*

6. Ongoing Monitoring and Updates

- Vertex will regularly review and update this policy to reflect ongoing UK GDPR reforms and maintain compliance with both UK and EU data protection requirements.

7. Providing Personal Data

By providing personal data on www.Vertex.com and any other website that belongs to Vertex, the User confirms that he/she has all necessary permissions to disclose personal data that will be later used by Vertex in a manner described in this Policy.

8. Personal Data Controller

VERTEX CONSULTING GROUP HOLDINGS LIMITED C/O Hillier Hopkins LLP First Floor, Radius House, 51 Clarendon Road, Watford, United Kingdom, WD17 1HP

9. Data Protection Officer

A Data Protection Officer has been appointed at Vertex: Rebecca Cook. In case of any questions regarding regulations concerning personal data processing described in this Policy, contact the Data Protection Officer by sending an e-mail to: GDPR@vertexagility.com

§1. Collection and use of Personal Data

a. Purpose of processing and legal basis

For individuals in the United Kingdom, Vertex also relies on the broadened legitimate interests legal basis as permitted under the UK GDPR reforms effective 2025. This includes, but is not limited to, direct marketing, intra-group administration, and network security

Vertex will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with work-finding services. The legal bases we rely upon to offer these services to you are:

- Consent
- Legitimate interest
- Legal obligation
- Contractual obligation

b. Legitimate interest

Where Vertex has relied on a legitimate interest to process your personal data our legitimate interest grounds are as follows:

- You have applied for an opportunity we have advertised.

Legitimate interest is one of the legal grounds provided for in Art. 6 para. 1 GDPR, which assumes that there are situations in which the Personal Data Administrator may perform specific processing of Personal Data. Such legitimate interest applicable at Vertex include:

- Possibility of pursuing claims or defending against them.
- Promoting Vertex, sending marketing information.
- Implementation of cooperation agreements with customers and suppliers.
- Conducting negotiations, discussions with potential customers
- Conducting recruitment for projects carried out for Vertex customers
- Handling inquiries sent to Vertex - providing answers to Users.
- Applying for job offer we advertised or send via e-mail, LinkedIn etc

In the event of contact with the User in order to provide an answer, the legal basis for the processing of Personal Data is the legitimate interest of Vertex as the administrator of Personal Data provided on the

contact form (Art. 6 para. 1 point f GDPR). The legitimate interest is manifested in the possibility of responding to the inquiry sent, providing the User with a comprehensive answer. Without the processing of Personal Data, in particular contact data, we will not be able to provide an answer, and thus, help in resolving an issue indicated in the inquiry.

c. Recipient/s of data

The Company will process your personal data and / or sensitive personal data with the following recipients:

- Clients and, should your application be successful, the following third parties:
- First Advantage (if applicable, should background checks be required by our client);
- Bullhorn (for the creation of contractual documents and, in the instance your placement is on a contract basis);
- Evertime (for the processing of your timesheets invoices, in the instance your placement is on a contract basis);

Benefits providers. Medical care providers, Health policy providers

Accounting offices and Bank’s to provide bank transfers

External providers of legal and accounting services

d. Statutory/contractual requirement

Your personal data is required by law and/or a contractual requirement (e.g. our client may require this personal data). You are obliged to provide the personal data and if you do not the consequences of failure to provide the data are:

- Withdrawal of an offer of employment from our client.

e. PROCESSING OF PERSONAL DATA

Vertex processes Personal Data for various purposes for which it needs a specific scope of Personal Data from the User, and each purpose of processing has its legal basis resulting from the provisions of the GDPR and sectoral regulations that contain regulations regarding the protection of Personal Data:

Scope of processed personal data	Purpose	Personal data storage period
Personal Data		
Full name	Conducting recruitment for projects carried put for Vertex and Vertex customers. Profiling the data held in order to better match marketing information and job offers to the User's preferences. Data obtained from the User for the conduct of the recruitment process. Vertex authorization obtained based on the express consent of the User - candidate.	Until the consent to the processing of Personal Data is withdrawn
E-mail address		
Phone number		

Vetting/ Background check data (if needed)		
Date of birth	Conducting recruitment for projects carried out for Vertex and Vertex customers and documents based on legal interest for storage. Data obtained from the User for the conduct of the Vetting and Background check process.	Until the consent to the processing of Personal Data is withdrawn ; 5 years after the completion of the recruitment process at the customer with a negative result
Nationality		
Personal identification Number (PESEL, NIN, ID number or other applicable)		
Information about education		
Information about work experience, employment history		
Information about completed courses, trainings other information contained in the application documents (CV, cover letter)		
References from previous employers		
Criminal Record Check		
Company Data		
Registered company address	Contacting customers' and suppliers' representatives to coordinate activities under the contracts. Conducting negotiations, discussions with potential suppliers / customers	The time of cooperation between Vertex and a customer / supplier or the period of negotiations with a potential supplier / customer. Limitation period for potential claims (3 - 6 years).
Registered address		
Company Number		
Tax number of the company		
Tax information		
Bank Account Number with Bank Number Owner Name		
Marketing Data		
Full name	Sending answers to Users, to the e-mail addresses or telephone numbers provided by them, to previous inquiries sent via the contact form. Sending marketing and promotional information about products and services, events and news, including subscription to the newsletter. Profiling the data held in order to better match marketing information and job offers to the User's preferences	Until the consent to the processing of Personal Data is withdrawn
E-mail address		
Phone number		
Data obtained from the User for the conduct of the recruitment process		
Data obtained from the User in connection with conducting marketing activities		

Legal Grounds for processing data for recruitment purposes:

Legal grounds for processing personal data (e.g. CVs, contact details, employment history, education):

1. Consent of the candidate to the processing of their personal data for one or more specific purposes, such as participating in the current or future recruitment processes.
2. Processing is necessary for the performance of a contract to which the candidate is a party (e.g. a recruitment service agreement), or to take steps at the request of the candidate prior to entering into such a contract (e.g. submitting an application).

3. Processing is necessary for compliance with a legal obligation to which the data controller is subject, e.g. under employment law, temporary employment regulations, or recruitment services law.
4. Processing is necessary to protect the vital interests of the data subject or another individual – rarely applicable in recruitment, but possible in emergency situations (e.g. a health incident during an interview).
5. Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority – generally not applicable to recruitment agencies.
6. Processing is necessary for the purposes of the legitimate interests pursued by the data controller or a third party, e.g. verifying qualifications of candidates on behalf of a client, ensuring the quality of recruitment services – provided that these interests are not overridden by the interests or fundamental rights and freedoms of the candidate.

Legal grounds for processing special categories of personal data (e.g. health data, disability status, trade union membership, religious beliefs – only if disclosed by the candidate):

1. Explicit consent of the candidate for one or more specified purposes (e.g. to accommodate workplace needs related to health conditions).
2. Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or the candidate in the field of employment and social security or social protection law (e.g. disability-related obligations toward the national fund for the disabled).
3. Processing is necessary to protect the vital interests of the data subject, who is physically or legally incapable of giving consent – used very rarely, in urgent situations.
4. Processing carried out by a not-for-profit organization with appropriate safeguards and a political, philosophical, religious, or trade union aim – rarely applicable in the recruitment context.
5. Processing relates to personal data that has been manifestly made public by the candidate, e.g. information on a public professional profile (LinkedIn) or in a voluntarily submitted CV.
6. Processing is necessary for the establishment, exercise or defence of legal claims, e.g. in the event of a dispute related to a recruitment process.
7. Processing is necessary for reasons of substantial public interest, on the basis of EU or Member State law, proportionate to the aim pursued and subject to suitable safeguards.
8. Processing is necessary for purposes of occupational medicine, assessment of the working capacity of the employee, medical diagnosis or healthcare management – only by authorised professionals or under an appropriate contract.
9. Processing is necessary for public health reasons, such as protecting against cross-border health threats or ensuring high standards of healthcare or medical products, with appropriate safeguards (including professional secrecy).
10. Processing is necessary for archiving purposes in the public interest, scientific or historical research, or statistical purposes, provided it is proportionate and respects the essence of data protection rights and includes specific safeguards for the rights and freedoms of individuals.

Legal basis for processing of personal data in UE

- Art. 6 para. 1 point a GDPR - consent to the processing of personal data
- Art. 221 § 1 of the Labor Code
- Art. 6 para. 1 point f GDPR - legitimate interest of Vertex as the administrator of personal data
- Art. 6 para. 1 point a GDPR - consent to the processing of personal data

§2. Personal Data transfers

a. Overseas Transfers

The Company may transfer your personal data to countries outside the European Economic Area (EEA) and/or the UK for the purposes of providing you with work-finding services. For transfers originating in the EEA, Vertex applies the EU Standard Contractual Clauses (SCCs) or other mechanisms as required by the EU GDPR. For transfers originating in the UK, Vertex applies the International Data Transfer Agreement (IDTA) and/or the UK Addendum to the SCCs as required by the UK GDPR and approved by the UK ICO. All such transfers are subject to appropriate safeguards to ensure the security and protection of your information

b. Transfer of personal data between Vertex companies

Vertex is a company that has Subsidiaries. Due to the fact that the Subsidiaries use IT systems belonging to Vertex for organisational facilitation in the implementation of recruitment and marketing purposes, managing relations with customers, suppliers, etc., Vertex transfers Users' Personal Data to its Subsidiaries. The transfer of Personal Data to subsidiaries is carried out pursuant to Art. 6 para. 1 point f GDPR, i.e. the legitimate interest of Vertex as the Personal Data Administrator. The legitimate interest manifests itself in the following matters:

- Search for User-Candidates by Vertex and its Subsidiary for a joint project for a customer.
- Joint negotiations with a potential customer in order to conclude a cooperation agreement.
- Joint search for a subcontractor to assist in the implementation of the project for the customer, which is run by the employees of Vertex and its subsidiaries.

The transfer of Personal Data to the Subsidiaries takes place by enabling the employees and coworkers of these companies to access the CRM system belonging to Vertex. In the context of Subsidiaries based in a country not belonging to the European Union or the European Economic Area, Vertex concluded additional contractual clauses with such subsidiaries securing the processed data and meeting the requirements of Art. 44-49 GDPR. These clauses are concluded due to the fact that in the case of subsidiaries based in a country outside the European Union or the European Economic Area, the rules set out in the GDPR do not apply to Personal Data processed by such entities.

§3. Data retention

The Company will retain your personal data only for as long as is necessary. Different laws require us to keep different data for different periods of time – you will find the specification of each period on the table above.

The Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services.

We must also keep your invoices, agreements, payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation.

Where the Company has obtained your consent to process your personal and sensitive personal data, we will do so in line with the above. Upon expiry of your consent, the Company will seek further consent from you. Where consent is not granted the Company will cease to process your personal data and sensitive personal data.

§4. Your rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to the Company processing your personal data and sensitive personal data, you have the right to withdraw that consent at any time by contacting our Data Protection Officer, Rebecca Cook via e-mail: GDPR@vertexagility.com.

For UK data subjects, these rights are provided under the UK GDPR and enforced by the UK Information Commissioner's Office (ICO)

§5. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact our Data Protection Officer, Rebecca Cook.

You also have the right to raise concerns with

Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK like

European Data Protection Supervisor (EDPS) +32 2 283 19 00 https://edps.europa.eu/_en

Polski Urząd Ochrony Danych Osobowych - Inspektor Ochrony Danych - (+48) 22 531-03-00 iod@uodo.gov.pl on website: <https://www.biznes.gov.pl/pl/portal/ou889>

if you believe that your data protection rights have not been adhered to.

§6. Cookies

The websites belonging to Vertex (including <https://www.vertexagility.com>) use cookies. By using these websites, the User agrees to the storing of cookies on the device with which they enter the website, as explained below.

Cookies are small text files sent to the User's browser by a site they visit at a given time. Cookies allow it to remember information about the visit. As a result, on subsequent visits, the site is easier to use and better adapted to the User's preferences.

Settings regarding cookies used on the <https://www.vertexagility.com/> other websites may be modified via our website or via a third-party website. Cookies are used by Vertex to:

1. Customize content of webpages to User's preferences, and to optimize their use (in particular, these files allow identification of User's device and proper display of the webpage tailored to their individual needs),
2. Create statistics that help to understand how Users use the websites which leads to improving its structure and content,
3. Deliver marketing content tailored to Users' interests.

The User may block saving cookies by accessing the preference settings in the cookies window that appears when visiting the website for the first time, accessing the "Cookie Settings" link located in the footer of the website, or changing their browser settings. Disabling cookies may affect the functioning of the website.

For UK users and non-EU users, Vertex applies the relevant countries' updated rules on cookies and direct marketing, which allow for more flexibility in obtaining consent, while ensuring users are informed and able to manage their preferences.