

# Privacy Notice

**MASTER RECRUITER RO S.R.L.** (trading as ANTAL INTERNATIONAL NETWORK Ltd in Romania) ("We", "Us", or "Our") is committed to protecting and respecting your privacy.

Our Group includes our subsidiaries, our ultimate holding company and its subsidiaries, our associated companies, and franchise offices.

This notice explains the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read it carefully to understand our practices regarding your personal data and how we will handle it.

For the purposes of data protection legislation, including the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679), the data controller is MASTER RECRUITER RO S.R.L., located at 301-311 Barbu Vacarescu Street, AFI Lakeview Offices, level 5, office HDR15, district 2, Bucharest, Romania. For queries relating to personal data, you can contact us via our Head Office Data Protection team at: [dpt@antal.com](mailto:dpt@antal.com).

## Who We Are and What We Do

We are a recruitment agency and recruitment business.

To conduct our business, we collect personal data from the following types of individuals:

- Prospective and placed candidates for permanent or temporary roles;
- Prospective and live client contacts;
- Prospective and live franchisee contacts;
- Supplier contacts to support our services;
- Employees, consultants, and temporary workers.

We collect this information to carry out our core business activities, including recruitment services and related ancillary functions.

## Information You Provide to Us or That We Collect About You

This includes information you give us by filling in forms on our group websites (e.g., [www.antal.com](http://www.antal.com)) or by corresponding with us via phone, email, in-person delivery, registration, or other means. It also covers data provided when you register on our sites, enter our databases, subscribe to our services, attend our events, participate in discussion boards or social media functions on our sites, enter competitions, promotions, or surveys, or report issues with our sites.

The information may include:

- Your name, address, private and corporate email addresses, and phone numbers;

- Financial information;
- Compliance documentation and references verifying your qualifications, experience, and right to work;
- Curriculum vitae (CV), cover letter, self-evaluation, references letters and contacts and where applicable, photograph;
- Links to your professional profiles in the public domain (e.g., LinkedIn, Twitter, business Facebook, or corporate websites).

## Information We Collect When You Visit Our Websites

During each visit to our sites, we automatically collect:

- Technical information, such as the Internet Protocol (IP) address used to connect your device to the internet, login details (if applicable), browser type, and version;
- Visit details, including full Uniform Resource Locators (URLs), clickstream data to, through, and from our sites (with dates and times), jobs or pages viewed or searched, page response times, download errors, visit durations to specific pages, interaction data (e.g., scrolling, clicks, mouse-overs), and methods used to navigate away from pages.

## Information We Obtain from Other Sources

We may gather information about you from sources such as LinkedIn, corporate websites, job board websites, online CV libraries, B2B support platforms (ie. Apollo.io) business cards, personal recommendations, and other similar channels.

We collaborate with third parties, including companies within our Group, business partners, subcontractors in technical, professional, payment, and other services, advertising networks, analytics providers, search information providers, credit reference agencies, and professional advisors. We may receive information about you from them to support our recruitment and ancillary services.

## Purposes of Processing and Legal Bases

We process your personal data for specific purposes, each tied to an appropriate legal basis under the GDPR. Below, we outline the key activities and their corresponding legal bases:

- To fulfill obligations arising from contracts we intend to enter into or have entered into with you, such as placement agreements or service contracts: **Contract** (processing is necessary for the performance of a contract or to take steps at your request before entering into one).
- To provide you with requested information, products, or services relevant to your career or organization, including introducing candidates to clients for temporary or permanent engagements: **Contract** (where a contract exists or is being negotiated) or **Consent** (e.g., for specific introductions where required, such as sharing your CV with a client).
- To inform you about similar goods or services you have previously purchased, received, or inquired about, such as updates on recruitment opportunities or related

services: **Legitimate Interests** (to support our business in providing relevant career or resourcing support, balanced against your rights).

- To support career development for candidates and resourcing strategies for clients and businesses: **Legitimate Interests** (to maintain and expand our recruitment services by leveraging our database of historical and current information).
- To manage website usage, including administering our sites for internal operations like troubleshooting, data analysis, testing, research, statistical, and survey purposes: **Legitimate Interests** (to ensure efficient operation and improvement of our online services).
- To notify you of changes to our services: **Legitimate Interests** (to keep you informed about updates that affect your interactions with us) or **Contract** (if related to an existing agreement).
- To ensure content from our sites is presented effectively for you and your device: **Legitimate Interests** (to optimize user experience).
- To enable your participation in interactive features of our services, such as discussion boards or events: **Consent** (where you choose to participate) or **Legitimate Interests** (to facilitate engagement).
- To maintain site safety and security: **Legitimate Interests** (to protect our systems and users) or **Legal Obligation** (to comply with applicable laws on data security).
- To measure or understand the effectiveness of advertising we serve and to deliver relevant advertising: **Legitimate Interests** (to improve our marketing efforts using aggregate data) or **Consent** (for personalized ads where required).
- To make suggestions and recommendations about goods or services that may interest you: **Legitimate Interests** (based on relevance to your profile) or **Consent** (for direct marketing).
- To comply with legal requirements, such as holding information for regulatory purposes or responding to authorities: **Legal Obligation** (processing is necessary to meet our legal duties).

## Our Legitimate Business Interests

As a recruitment agency, sharing candidate and client data is essential to our operations. We maintain a database of historical and current information to support career aspirations, resourcing needs, and business development.

We may process publicly available data to send marketing communications. You have the right to ask us not to process your personal data for marketing purposes. Where technically and operationally feasible, we will inform you if we intend to use your data for such purposes.

## Other Uses of Your Data

We also use your data to:

- Manage website usage;
- Notify you of service changes;
- Ensure content is presented effectively for you and your device.

This supports:

- Site administration, internal operations (e.g., troubleshooting, data analysis, testing, research, statistics, surveys);
- Site improvements for optimal presentation;
- Enabling participation in interactive features;
- Maintaining site safety and security;
- Measuring advertising effectiveness and delivering relevant ads;
- Making personalized suggestions about goods or services.

We do not engage in automated decision-making or profiling. Our systems search data based on human-set parameters, with human involvement in all decisions.

## User Tracking

We use Leadoo's tracking service to monitor user behavior on our site and combine it with data from interactions (e.g., chats). Leadoo employs etag tracking to link user sessions, similar to cookies. For details on tracked data and your rights, see Leadoo's Privacy Policy. Leadoo acts as our processor under GDPR, and we are the controller. Clear your browser cache to stop tracking. For more on Leadoo's GDPR compliance, visit <https://leadoo.com/privacy-policy-processor/>.

## Cookies

Our websites use cookies to distinguish users and enhance experiences. For details on cookies and their purposes, see our Cookies Policy [link to Cookies Policy].

## Disclosure of Your Information (Inside and Outside the EEA)

We may share your data with:

- Any Group member, within or outside the EEA.

Selected third parties, including:

- Clients for candidate introductions;
- Candidates for interview/engagement arrangements;
- Business partners, suppliers, and subcontractors for contract performance and compliance;
- Email marketing specialists, event organizers, payment providers;
- Advertisers and networks (using aggregate, non-identifiable data);
- Analytics and search engine providers for site optimization;
- Credit reference agencies, insurers, compliance partners for role suitability assessments.

We disclose data to third parties if:

- Selling or buying business/assets (sharing with prospective parties);
- Acquired by a third party (data as transferred asset);

- Required by legal duty, to enforce agreements, or protect rights, property, or safety (including fraud/credit risk exchanges).

Third-party processing bases include their legitimate interests, contractual obligations to us, contemplated contracts, or legal duties.

## **Where We Store and Process Your Data**

Data may be transferred and stored outside the EEA, including to third parties and franchise offices for recruitment. Staff outside the EEA (working for us or suppliers) may process it for recruitment and support. By providing data, you agree to this, subject to our security measures aligned with this notice.

Internet transmissions are not fully secure; we cannot guarantee data en route but use strict procedures post-receipt to prevent unauthorized access.

## **Retention of Your Data**

We retain data only as needed for legitimate interests and with your implied agreement. We have a data retention policy and routines to delete unnecessary data.

To ensure accuracy:

- We verify information before introductions;
- We maintain contact for updates.

Retention criteria include data nature, accuracy, legal obligations, interview/placement status, and industry knowledge. We may archive, pseudonymize (replacing identifiers with artificial ones), or retain data on financial systems only. Our retention notice is available on request.

## **Your Rights**

As a data subject under the GDPR, you have several key rights regarding your personal data. These include the right to be informed about how we collect and use your data; the right of access to view your personal data and any supplementary information we hold; the right to rectification, allowing you to correct inaccurate data or complete incomplete information; the right to erasure (often called the 'right to be forgotten'), enabling you to request deletion of your data in specific circumstances; the right to restrict processing, where you can ask us to limit or suppress the use of your data under certain conditions; the right to data portability, which lets you obtain and reuse your data across different services; and the right to object to processing in particular situations, such as for direct marketing purposes. Additionally, you have rights concerning automated decision-making and profiling, although we do not conduct these activities. Finally, where we process your data based on consent, you can withdraw that consent at any time without affecting the lawfulness of prior processing. To exercise any of these rights, please contact us at [dpt@antal.com](mailto:dpt@antal.com). We may need to verify your identity before responding to your request. You also have the right to lodge a complaint with the supervisory authority, the National Supervisory Authority for Personal Data Processing (ANSPDCP) in

Romania, if you believe your rights have been infringed. For more information, visit their website at [www.dataprotection.ro](http://www.dataprotection.ro).