

Privacy Policy – Applicant Tracking System (ATS)

Effective Date: [Insert Date]

Last Updated: [Insert Date]

Tundra (“we”, “our”, “us”) is committed to protecting the personal data of candidates who use our Applicant Tracking System (“ATS”). This Privacy Policy explains how we collect, process, store, share, and protect your personal data.

1. Data Controller

The organization responsible for your personal data, or data controller, for your personal data is:

[Company Name]

[Address]

[Email Address for Privacy Inquiries]

[Phone Number]

We have appointed a **Data Protection Officer (DPO)** who can be contacted at:

[Insert DPO Name & Contact Information]

2. Personal Data We Collect

When you apply for a role or register in our ATS, we may collect the following personal data:

- Identification details (e.g., name, address, phone number, email).
- Employment history, education, qualifications, certifications.
- Resume/CV and cover letters.
- References, skills, and professional interests.
- Assessment results, interview notes, or work eligibility documentation.
- Technical data (e.g., IP address, login times, device/browser information).

We will only request information that is relevant for recruitment and placement purposes.

3. Purposes of Processing

We process your personal data for the following purposes:

- To evaluate your application and qualifications for current and future job opportunities.
- To communicate with you during the recruitment process.
- To create and maintain your candidate profile in our ATS.
- To match you with potential employment opportunities with our clients.
- To comply with applicable legal and regulatory obligations.
- To improve and secure our ATS and recruitment services.

4. Legal Basis for Processing

We rely on the following legal bases for processing your personal data:

- **Consent:** where you have given explicit permission for us to process your data (e.g., for retention beyond one recruitment cycle).
- **Contractual necessity:** to take steps at your request prior to entering into an employment or service contract.
- **Legal obligations:** to comply with applicable laws (e.g., employment, tax, immigration).
- **Legitimate interests:** to operate an efficient recruitment process, subject to your rights.

5. Data Sharing and International Transfers

We may share your personal data with:

- Our employees and recruiters involved in the hiring process.
- Clients seeking to fill open positions (only relevant details are shared).
- Third-party service providers supporting the ATS (e.g., hosting, IT, assessment tools).
- Regulatory or governmental bodies if required by law.

We transfer your personal data outside your country with your consent, through the consent form below.

6. Data Retention

We retain personal data only for as long as necessary:

- Candidate application data: **12 months** after completion of the recruitment process, to allow you to exercise relevant recourse, unless you consent to extended retention.
- If you become an employee, employee placement records: for the duration of the contract and in accordance with statutory retention periods (typically 6–7 years for financial/contractual records).
- Talent-pool data, with your consent and until you withdraw consent or object to processing.
- Marketing, with your consent and until you withdraw consent or object to processing.

At the end of the retention period, personal data will be securely deleted or anonymised.

7. Your Rights to your Personal Data

With respect to your personal data, you have the right to request :

- **Access:** to request a copy of your personal data.
- **Rectification:** to correct inaccurate or incomplete data.
- **Erasure** or deletion of your personal data.
- **Restriction:** to limit processing of your personal data.
- **Portability:** to have the personal data you provided to us transferred to another organization in a structured, commonly used format.
- **Objection:** to object to processing, including for direct marketing.
- **Withdrawal of consent:** at any time, without affecting the lawfulness of processing before withdrawal.
- **Complaint:** to lodge a complaint with your local data protection or privacy authority.

Requests can be made by contacting our DPO at [Insert Contact Information].

8. Security of Personal Data

We implement appropriate **technical and organisational measures** to protect your personal data, including:

- Secure data hosting with encryption in transit and at rest.
- Access controls and authentication procedures.
- Regular security testing and monitoring.
- Confidentiality obligations for staff and contractors handling personal data.

9. Updates to this Privacy Policy

We may update this Privacy Policy from time to time. Any significant changes will be communicated through our ATS or directly to you. Please check this page periodically for the latest version.

10. Contact Us

For questions, concerns, or to exercise your GDPR rights, please contact:

Data Protection Officer (DPO)

Michael Savo

msavo@tundratechnical.com

4711 Yonge Street, Toronto, ON
Canada, M2N 6K8

Candidate Privacy Notice (Short Form)

Who we are

We are **Tundra Technical Solutions Inc.**, a staffing and recruitment company. We use this Applicant Tracking System (“ATS”) to manage job applications and connect candidates with career opportunities.

What personal data we collect

When you apply or register in our ATS, we collect details such as your:

- Name and contact information
- CV/resume, work history, education, and skills
- Notes from interviews or assessments
- Job preferences and eligibility information

Why we use your data

We process your personal data to:

- Assess your suitability for roles
- Contact you during the hiring process
- Match you with opportunities at our clients
- Comply with legal requirements

Who we share your data with

We may share your personal data with:

- Our staff involved in recruitment
- Our clients who are hiring
- Trusted third-party providers that support our ATS
- Authorities if required by law

Some of this data may be processed **outside your country** . We do so with your express consent.

How long we keep your data

We keep your data for **12 months** after the recruitment process to allow you to exercise relevant recourses . If you agree, we may keep it longer to consider you for future opportunities. After that, your data will be securely deleted or anonymized.

Your rights

You have the right to request :

- Access, correct, or delete your data
- Limit or object to how we use your data
- Have the personal data you provide to us transferred to another organization.
- Withdraw your consent at any time
- Complain to your local data protection or privacy authority

Contact us

For questions or to exercise your rights, please contact our:

Data Protection Officer (DPO):

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Your consent

☐ I consent to [Company Name] collecting and processing my personal data for recruitment purposes.

☐ I consent to my data being transferred outside my country.

☐ (Optional) I consent to my data being retained for [12/24 months] for future job opportunities.