

Krystelis Data Privacy Notice

1. Scope

This Privacy Notice applies to individuals whose personal data is processed by Krystelis in the course of its business activities.

2. Who we are

Krystelis Ltd (“Krystelis”, “we”, “our”) is committed to protecting your personal data and ensuring it is handled in accordance with applicable data protection laws, including the UK GDPR and, where applicable, EU GDPR.

For the purposes of data protection law, Krystelis may act as either a Data Controller or a Data Processor, depending on the nature of the services provided.

- Where Krystelis acts as a Data Controller, we determine the purposes and means of processing personal data.
- Where Krystelis acts as a Data Processor, we process personal data on behalf of our clients in accordance with their instructions.

Krystelis has appointed a Data Protection Officer (DPO) who is responsible for overseeing compliance with data protection requirements.

3. What personal data we collect

The personal data we collect depends on how you interact with Krystelis and may include:

- Contact information (such as name, job title, email address and telephone number)
- Professional information (such as employment details, qualifications, and experience)
- Business-related information (such as correspondence, contracts and project-related data)
- Technical information (such as website usage data, IP address and browser information collected through cookies or similar technologies)
- Recruitment-related information (such as CVs, application details and references, where applicable)

We collect personal data directly from you where possible, as well as from publicly available sources, clients, or third parties where appropriate. Where required, Krystelis may also process special category data (such as health-related data, where relevant to services provided) in accordance with applicable legal and contractual requirements.

4. How we use personal data and lawful basis

Krystelis uses personal data for the following purposes:

- To provide services to our clients and perform contractual obligations
- To manage business relationships with clients, suppliers, and partners

- To process job applications and manage recruitment activities
- To comply with legal and regulatory requirements
- To manage and improve our business operations, including internal administration and quality management
- To provide information about our services and respond to enquiries

Where required by applicable data protection laws, Krystelis relies on one or more of the following lawful bases for processing personal data:

- Performance of a contract
- Compliance with a legal obligation
- Legitimate interests pursued by Krystelis or its clients, except where such interests are overridden by the rights and freedoms of individual
- Consent, where specifically obtained (for example, for marketing communications)

Where Krystelis acts as a Data Processor, personal data is processed only in accordance with the documented instructions of the relevant Data Controller (client) and applicable contractual obligations.

5. Sharing of personal data

Krystelis may share personal data with the following categories of recipients, where necessary and in accordance with applicable data protection laws:

- Clients, where Krystelis is providing services on their behalf
- Service providers and suppliers who support our business operations (such as IT systems, cloud hosting providers, and professional advisors)
- Regulatory authorities, government bodies, or law enforcement agencies where required by law
- Third parties involved in recruitment processes (such as background check providers), where applicable

These recipients may be located in the UK, EEA, or other jurisdictions as part of Krystelis's global operations.

Where Krystelis acts as a Data Processor, personal data is shared only in accordance with the instructions of the relevant Data Controller (client).

Krystelis ensures that appropriate contractual, technical, and organisational measures are in place to protect personal data when it is shared with third parties.

Personal data will not be sold or otherwise disclosed for unrelated commercial purposes.

6. International data transfers

Krystelis operates globally, and personal data may be transferred to, stored, or processed in countries outside the UK or European Economic Area (EEA).

Personal data may be accessed or processed by Krystelis affiliated entities or service providers located in other jurisdictions, including India. In most cases, personal data remains stored within secure systems located in the UK or EEA, with access provided to authorised personnel in other locations.

Where personal data is transferred outside the UK or EEA, Krystelis ensures that appropriate safeguards are in place in accordance with applicable data protection laws. These safeguards may include the use of Standard Contractual Clauses (SCCs) or other legally approved mechanisms.

Krystelis implements appropriate measures to ensure that personal data remains protected and handled securely in accordance with this Privacy Notice and applicable legal requirements.

7. How we collect personal data

Krystelis collects personal data in several ways, depending on how you interact with us. This includes:

- Directly from you, for example when you contact us, engage our services, apply for a role, or provide information as part of a business relationship
- Through our interactions with clients, suppliers, and business partners while providing services
- Through our website, including via cookies and similar technologies
- From third parties or publicly available sources, where appropriate and in accordance with applicable data protection laws

Where required, personal data is collected and processed in accordance with client instructions and contractual obligations.

8. How we store and retain personal data

Krystelis stores personal data using secure systems and applies appropriate technical and organisational measures to protect it from unauthorised access, disclosure, alteration, or destruction. This includes the use of secure cloud-based systems and approved service providers

Krystelis retains personal data only for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying legal, regulatory, contractual, and reporting requirements.

Retention periods are determined in accordance with applicable laws, client contractual requirements, and Krystelis's Records Management procedures (SOP-COR-05). When personal data is no longer required, it is securely deleted or anonymised.

Where Krystelis acts as a Data Processor, retention is managed in accordance with client instructions and contractual agreements.

9. Marketing and website use

Krystelis may use your contact information to provide you with information about our services, where permitted by applicable law. You may opt out of receiving marketing communications at any time by contacting us at info@krystelis.com.

Our website uses cookies and similar technologies to enhance user experience and analyse website usage. Information collected may include technical data such as IP address, browser type, and browsing behaviour. You can control or disable cookies through your browser settings. Please note that some website features may not function properly if cookies are disabled.

Our website may contain links to third-party websites. This Data Privacy Notice applies only to Krystelis, and we are not responsible for the privacy practices of other organisations. We encourage you to review the privacy notices of any third-party websites you visit.

10. Your data protection rights

Under applicable data protection laws, you have the following rights in relation to your personal data:

- The right to access your personal data
- The right to request correction of inaccurate or incomplete personal data
- The right to request erasure of your personal data, where applicable
- The right to restrict or object to processing in certain circumstances
- The right to data portability, where applicable
- Rights relating to automated decision-making and profiling, where applicable

11. Changes to this privacy notice

Krystelis keeps this Privacy Notice under regular review and may update it from time to time to reflect changes in legal, regulatory, or operational requirements.

The latest version will be made available through appropriate channels.

12. How to contact us

If you require any further assistance with this Privacy Notice, the personal data we hold about you, or you wish to exercise your data protection rights, please contact our Data Protection Officer (DPO) by email at info@krystelis.com. Krystelis will respond to requests in accordance with applicable legal requirements.

You also have the right to lodge a complaint with a relevant supervisory authority.

13. How to contact a supervisory authority

If you have concerns about how your personal data is handled, you have the right to lodge a complaint with a relevant supervisory authority.

In the UK, the supervisory authority is the Information Commissioner's Office (ICO).