

Angela Mann Recruitment: Privacy Notice

'Angela Mann Recruitment' (referred to throughout as 'we', 'us', 'our') is a recruitment business which provides work-finding services to its clients and work-seekers.

We take our responsibilities in respect of the privacy of your personal data extremely seriously. The aim of this policy is to provide you with fair, transparent, and accurate information about; what personal data we hold, why we hold it, and what we do with it.

For the purpose of providing work-finding services and/or information relating to roles relevant to you, we will only use your personal data in accordance with this privacy statement. We must process personal data (and in some instances special categories of personal data) so that we can provide our recruitment services – in doing so, we act as a data controller.

We must have a legal basis for processing your personal data and sensitive data and we will always comply with current protection laws.

1. Collection and use of 'personal data':

We will collect personal data (which may include special categories of personal data) and will process your personal data for the purpose of providing you with our work-finding services such as; obtaining job opportunities, working with you on these opportunities, contacting you about job opportunities, assessing your suitability for those opportunities, updating our database, putting you forward for job opportunities, arranging payments to you and to develop and manage our services and relationships with you and our clients.

The personal data we collect, and process may come from sources such as your application or registration form or via our website, or we may collect them from another source such as a jobs board or LinkedIn.

2. What types of 'personal data' do we collect and process:

- Full name, address, email, phone number and other contact details
- Employment history, role and title, education, qualifications, details related to skills and experiences, also information on interviews and placements through us.
- Visa, passport and other right to work or identity information, date of birth, sex/gender.
- Bank details, national insurance and tax (payroll) information, emergency contacts details
- Reference information (from referees and pre-employment checks from third parties)
- Information from ongoing communications; meetings, calls, emails, regarding your requirements
- Information, feedback about organisations, jobs, company benefits, interviews, offers and/or other personnel e.g. a references
- Marketing preferences, website user stats
- Only if required, sensitive personal data such as health records (see 'Special Category Data')

- In the course of providing our recruitment service, we may from time to time receive personal data from regulatory or government authorities such as HMRC, professional bodies or, where applicable, safeguarding authorities, which we are required to process.

2 a. Special categories of personal data (SCD):

SCD information is intensely sensitive personal to you and is usually irrelevant to our consideration of your suitability for a role. Examples are details that reveal your; racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sexual orientation, information concerning to your health.

Regardless of the basis for your dealing with us, we request that you do not provide us with any sensitive personal information, unless absolutely necessary, or specifically requested for a particular role or purpose. Should you choose to share with any of the above information with us in conversation, we shall only use that data for the purposes of our relationship or meeting our obligations for the provision of our recruitment services. This will be for one or more of the following reasons:

- You have explicitly consented to this data being processed.
- For the purpose of assessing your suitability for job roles or working capacity
- Where processing is necessary for the purpose of obligations or rights under employment, social security or social protection law
- To maintain records of our dealings to address any later dispute, including but not limited to the establishment, exercise or defence of any legal claims

2 b. Criminal Offence Data

We only ask for details of and process Criminal Offence Data, only where we have a lawful basis to do so. This would only happen where we have your explicit consent or we are required to process this information to comply with any legal obligations imposed upon us as an employment agency, employment business or otherwise. Example: where the law requires that a DBS certificate is obtained for a particular role or organisation. Where this is relevant to your suitability, and/ or required by law, we will have obtained your explicit consent in advance.

3. Where we received/obtained your 'personal data'; directly from you, indirectly or from a third party:

Most of the personal information we process is provided directly from you, the work-seekers or client. An example is below, though this is not an exhausted list and there may be other possibilities not listed.

- Where you have provided us with your contact details or other information for the purposes of using our services e.g. a CV (curriculum vitae), an application or registration form.
- Communications with you via a call, email, meeting or other times of engagements such as a job enquiry, service enquiry.
- Our CRM, where you have engaged with is previously. Our website and software applications
- Jobsites; e.g Charity Jobs, Third Sector, Reed, sites or providers where we have subscribed to.

- Social Media such as LinkedIn and other social media platforms and advertisements
- The public domain, publicly accessible source such as charities website.
- Third party referrals, other candidates, other users or clients of our services, persons connected with you, or whose details you have provided to us.
- Engagement via phone, email, video conferencing or meetings with staff or other representatives of the organisation you represent or have been otherwise engaged with.

3 a. What if we obtain your 'personal data' from a third party:

Where your personal information is obtained from a third party, it is our policy to advise you of the source when we first communicate with you. Part of our business activity involves researching information relating to individuals for the purposes of filling job roles. This may include obtaining personal data from the above sources. Where information from third party sources is of no use to us, or where you have notified us that you do not want us to provide you with services, we shall discard it, however we may maintain a limited record in order to avoid the duplication of process.

Where we consider that information may be of use to us in pursuance of the provision of our Recruitment Services, any processing will be in accordance with this Privacy Notice. You do have the right to object to processing, please see section on 'Your rights'.

4. Why we have your 'personal data' and the purpose of processing:

We will process your personal data (which may, only when lawful, include special categories of personal data) and will process your personal data for the purposes of providing you with work-finding and recruitment services. Example of which are below:

- Contacting you about job opportunities with us/clients, introducing and/or supplying you to actual/potential job opportunities, confirming contracts, related admin; timesheets and payroll
- Assessing and reviewing your suitability for those opportunities.
- Developing and managing our services and relationship with you and our clients.
- Communicating with 3rd parties due to; an emergency, accident related to workplace safety
- Sending information to third parties with whom we have/intend to enter into arrangements which are related to our Recruitment Services
- Complying with our legal obligations; reviewing, using and passing information as required for the protection of health and safety or carrying out reasonable welfare checks.
- Providing information to regulatory authorities/ statutory bodies/ our legal or other professional advisers including insurers.
- Collating market or sector information and providing the same to our clients. To market our Recruitment Services
- Collecting and storing your personal data, whether manual or electronic. Retaining a record of our dealings, recording how you engage with our Recruitment Services. Updating and maintaining correct information on our database.
- Purposes of backing up information on our IT and communications systems
- Determining training and compliance with our obligations and best practice

On some occasions we may be required to use your data for the purpose of investigating, reporting and detecting crime and also to comply with laws that apply to us. We may also use your information during the course of internal audits to demonstrate our compliance with certain industry standards.

5. Our legal basis for processing:

Under the UK General Data Protection Regulations (GDPR), we must have a lawful basis to process your personal data. The lawful basis we rely upon to offer our work-finding services to you are:

- Legal obligation (Regulatory and Statutory); processing is necessary for compliance and a legal obligation to which the data controller/ data processor is subject to.
- Contractual obligation: processing is necessary for the purpose of a contract or to takes specific steps before entering into a contract.
- Legitimate interest: processing is necessary for us to provide work-finding services to individuals and clients.
- Your consent: Where you have consented to us processing your personal data or sensitive data to provide work-finding services.

5 a. Legal obligation (Regulatory and Statutory):

We have certain legal and contractual requirements to collect personal data (e.g. to comply with the Conduct of Employment Agencies and Employment Businesses Regulations 2003, immigration and tax legislation, and in some circumstances safeguarding requirements). Our clients may require this personal data, and we may need your data to enter into a contract with you. If you do not give us the personal data we need to collect in order to comply with our statutory and legal requirements, we may not be able to continue to provide work-finding services to you. Examples of compliance with legal obligations (regulatory and statutory):

- Verify your identity and right to work.
- Statutory and regulatory obligations relating to the business; e.g complying with tax, bribery, fraud/crime prevention, health and safety and data protection legislation, and co-operating with regulatory authorities such as HMRC or the Information Commissioner's Office.
- Maintain records for specific periods required under regulations.
- Statutory and regulatory obligations; Payroll, tax, social security, HMRC reporting requirements, and any other law or regulation.
- Asses your suitability for an external role.

5 b. Contractual obligation:

To provide our Recruitment Services, we may enter into a contract with you and/or a third party. In order to enter into a contract, we will need certain information, for example your name and address. A contract will also contain obligations on both your part and our part, and we shall process your data as is necessary for the purpose of those obligations. For example, in order to process payroll, a national insurance number and bank details will be required.

5 c. Legitimate interest:

In providing our recruitment services and where we have a legitimate reason to process your data, it will be based on reasons reasonable to what you would expect from us to provide our work-finding services to you and our clients, which include:

- Establishing compliance with contractual obligations with clients or suppliers.
- Inform job seekers of a new jobs or/and keep you updated of suitable opportunities that we believe match your experience, skills, financial requirements, and any other requirements.
- Contact job seekers and clients with information about similar products or services to enhance our services, ensure you kept updated with suitable roles or changes to any policies.
- Source potential opportunities, roles, work-seekers as part of our services. Where we feel your interest in our services or opportunities would be of interest and of benefit to you.
- Contacting you to seek consent where needed.
- Manage our database and keep our work-seeker and clients records up to date.
- Addressing any query or dispute resolution that may arise including establishing, exercising, or defending claims.
- Understanding trends to improve the business processes to work-seekers and clients, using data obtained via website or other sources, i.e. the source of where you first interacted with us.
- As otherwise necessary to provide our services and/or to meet our obligations towards you, the party whom you represent, or other clients or suppliers.

For our commercial viability and to pursue these legitimate interests, we may continue to process your personal data for as long as we consider necessary for these purposes.

5 d. Consent:

We may process your personal data on the basis that you have consented to us doing so for a specific purpose, for example; You have provided your contact details in order for us to provide you with details of our services and have consented to our processing of your data for that purpose.

- You apply for a specific role and consented to our processing of your data for the purpose of progressing your application and considering your suitability for roles.
- Other cases, you may have provided your written or verbal consent to the use of your data for a specific reason, for example references.
- Should we require your consent for obtaining specific personal information such as; information for a DBS check, and have a legal obligation to process this data, we will request your consent prior and formally process this requires, and will record your response as legally required.

You may withdraw your consent to our processing of your personal data for a particular purpose at any stage. However, please note that we may continue to retain, or otherwise use your personal information thereafter where we have a legitimate interest or a legal or contractual obligation to do so. Our processing in that respect will be limited to what is necessary in furtherance of those interests or obligations. Withdrawal of consent will not have any effect on the lawfulness of any processing based on consent before its withdrawal. Please refer to 'your rights'.

We may process personal data where otherwise required by law, including for the protection of health and safety of you and others or where we are required to do so to protect the vital interests of you or others.

We may send you newsletters or information on our services via email. You will always be able to withdraw your consent / opt out at any stage by responding to the email and confirming you no longer wish to receive this information from us. Please refer to 'your rights'.

6. Recipient/s of data. Who we share personal data with:

In order to operate effectively as a business and provide our services to you we may need to pass on your personal data and/or sensitive personal data to trusted third parties. We shall not share your personal information unless we have informed you first. Persons, organisations with whom we may share your personal information include:

- Clients or third parties (who we may introduce or supply you to) for the purposes of providing our services.
- Former or prospective new employers that we obtain or provide references to.
- Payroll service providers who manage payroll on our behalf or other payment intermediaries who we may introduce you to
- Third Parties, Government Bodies, Recruitment and Employment Confederation, who carry out audits to assess the compliance and processes of the business to ensure its adherence to all relevant legislation, legal obligation, and good practice guidance
- Other recruitment agencies in the supply chain (e.g. master/neutral vendors and second tier suppliers) used by our clients;
- IT and CRM providers, where we hold your information.
- Any third-party organisations that we use to carry out suitability checks on work-seekers e.g. Companies House, the Disclosure and Barring Service (DBS).
- Legal and professional advisers, Insurers
- Emergency services and health professionals in the event of an emergency, accident, injury or a risk to the health and safety of you or others

7. Overseas Transfers

The Company may transfer the information you provide to us to countries outside the UK and/or the European Economic Area ('EEA') for the purposes of providing you with work-finding services. We will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

8. Data retention:

We will retain your personal data only for as long as is necessary for the purpose we collect it. In most circumstances we will retain for no more than 6 years from the last point at which we provided any services or otherwise engage with you. Different laws may also require us to keep different data for different periods of time. For example, 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 are required to keep your records relating to the right to work in the UK 2 years after employment or the engagement has ended alterable and working time records including your 48 hours opt out notice annual leave/holiday records 2 years from the time they were created.

Additionally, we must also keep your 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. This is currently 3 to 6 years.

Where we have obtained your consent to process your special categories of personal data as DBS check, we will do so in line with the retention policy. Upon expiry of that period, we will seek further consent from you. Where consent is not granted, we will cease to process your personal data.

9. Your rights:

We take the protection of your personal data very seriously and it is important that you know your rights within that context, which include rights to:

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

You have the right to withdraw your consent, request that we erase data or cease any processing activity at any time by contacting data protection officer. Please note that if you withdraw your consent to further processing that does not affect any processing done prior to the withdrawal of that consent, or which is done according to another legal basis. There may be circumstances where we will still need to process your data for legal or official reasons. Where this is the case, we will tell you and we will restrict the data to only what is necessary for those specific reasons.

If you have any questions concerning your rights or should you wish to exercise any of these rights please contact the Managing Director, Angela Mann; angela@angelamannrecruitment.com

10. Automated decision-making:

We do not use any automated decision-making software.

11. Sale of business:

If the Company's business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business. Where the sale of the business results in the transfer of your details to a different data controller we will notify you of this.

12. Cookies and login files:

We may obtain data about you from cookies. These are small text files that are placed on your computer by websites that you visit. They are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies also enable us to deliver more personalised content. Most web browsers allow some control of most cookies through the browser settings. Please note that in a few cases some of our website features may not function if you remove cookies from your browser. We use IP addresses to analyse trends, administer the site, track users' movements, and to gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

13. Links to external websites:

Our website may contain links to other external websites. Please be aware that we are not responsible for the privacy practices of such other sites. When you leave our site, we encourage you to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by our website.

14. Data Security

We take every precaution to protect users' information, e.g. firewalls, browser certification technology, encryption, limited access, use of passwords etc. as appropriate. Only employees who need the information to perform a specific job (for example, consultants or our accounts clerk) are granted access to your information.

We use all reasonable efforts to safeguard your personal information. However, you should be aware that the use of email/ the Internet is not entirely secure and for this reason the Company cannot guarantee the security or integrity of any personal information which is transferred from you or to you via email/the Internet.

If you have any questions about our website security, email; hello@angelamannrecruitment.co.uk

15. Changes to this privacy statement:

We will update this privacy statement from time to time. We will post any changes to the statement with revision dates. If we make any material changes, we will notify you.

15. Queries or complaints:

If you have any queries about the details in the policy or wish to complain about this privacy notice or any of the procedures set out in it, please contact; Data Protection Officer, Angela Mann angela@angelamannrecruitment.co.uk

You also have the right to raise concerns with the Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/make-a-complaint/>, or any other relevant authority should your personal data be processed outside of the UK and you believe that your data protection rights have not been adhered to.

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