

## **PRIVACY NOTICE**

Being transparent and providing accessible information to individuals about how we will use their personal data is important for our organisation. The following are details on how we collect data and what we will do with it:

### **What personal data do we collect?**

We will collect only the information that is required for the purpose it is being collected for. This may be (but not limited to):

#### **For Candidates**

- Name
- Date of birth
- Gender
- Marital status
- Nationality
- Ethnicity (for diversity information)
- Contact details
- Address
- Education details
- Employment history
- Details about your work related skills and experience
- Information about your health and any disabilities
- Referee details
- Immigration status (for work permits)
- A copy of your driving licence/passport/identity card
- National Insurance number
- Details of any criminal convictions/proceedings
- Information on your remuneration, benefits and pension arrangements
- Information on your employment status
- Information about your goals and needs on future employment
- IP address

#### **For Clients**

- Name
- Contact details (phone number and email address)
- Office location and address
- Records of our contact with you (calls, emails, meetings etc)

#### **For Suppliers**

- Name
- Contact details
- Company address
- Bank details (for payment)

## Who is collecting your personal data?

Our team of recruiters, account managers and business development managers will collect personal data from candidates that allow us to put them forward for roles (with their consent). They will also collect personal data from Clients to ensure we can maintain a smooth working relationship.

Our administration team will collect personal data from suppliers.

## How do we collect personal data?

We collect personal data in three ways:

1. Directly from you (the candidate, client, staff member of supplier) by;
  - a) Entering your details on the Perpetual Partnerships website
  - b) Sending/handing us a copy of your CV
  - c) Applying for jobs in response to our adverts via our website or job board
2. From third parties
  - a) Your referees may disclose personal information about you
  - b) Our clients may disclose personal information about you
  - c) LinkedIn and other job boards via searches
  - d) Social media. If you 'like' or 'follow' us we will receive your personal information

3. Automatically

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us.

When you visit our website there is certain information that we may automatically collect, whether or not you decide to use our services. This includes your IP address, the date and the times and frequency with which you access the website and the way you browse its content. We will also collect data from you when you contact us via the website. We collect your data automatically via cookies, in line with cookie settings in your browser.

## Why do we collect your personal data and how will it be used?

We 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. If you are a supplier we will collect personal data in order to comply with legal requirements. We use your data in the following ways:

### Candidate Data

- Recruitment Activities
  - Collecting data from the Candidate or other sources such as LinkedIn
  - Storing Candidate data on our CRM so we can contact candidates in relation to opportunities relevant to them
  - Providing Candidates with our recruitment services
  - Assessing data about Candidates against relevant vacancies
  - Sending Candidate information to Clients in order to apply for jobs

- Carrying out the Company's obligations arising from contracts entered into.
- Facilitating the Company's payroll and invoicing processes
- Carrying our customer satisfaction services
- Verifying details you have provided, using third party resources (such as psychometric evaluations or skills tests), or to request information (such as references, qualifications and potentially any criminal convictions, to the extent that this is appropriate and in accordance with local laws);
- Complying with the Company's legal obligations in connection with the detection of crime or the collection of taxes
- Marketing Activities
  - Sending relevant and targeted marketing messages
- Equal Opportunities Monitoring
  - Ensuring our recruitment processes are aligned with our approach to equal opportunities

### Client Data

- Recruitment Activities
  - Storing your details and updating them as necessary so that we may contact you in relation to recruitment activities
  - Keeping records of our conversations and meetings so that we can provide the best service to you
  - Undertaking customer satisfaction surveys
- Marketing Activities
  - Targeted marketing campaigns

### Supplier Data

- Store and update your details on our database so that we can contact you in relation to our agreements

If your personal data was given to us by a staff member or candidate (i.e. as a referee or emergency contact) we will only use it for that purpose.

## Who do we share your personal data with?

Where appropriate and in accordance with legislation we may share your personal data with the following:

- Our Group of Companies
- Potential employers
- Third parties who we have retained to provide services such as reference, qualification and criminal conviction checks.

## How do we safeguard your personal data?

Your data is held securely on our server. Please contact us for further information on our IT security.

## How long do we keep your personal data for?

We will delete your personal data from our database if we have not had any meaningful contact with you for five years (or longer if we believe we are required by law to keep your personal data for longer). After this period it is likely your data will no longer be relevant for the purposes for which it was collected.

## Contacts

<b>Data Protection Officer</b> For queries relating to: <ul style="list-style-type: none"><li>• adding, amending or deleting <i>personal data</i></li><li>• responding to subject access requests and requests for clarification</li><li>• reporting data breaches and making complaints</li></ul>	Louise Blackham, Operations Executive T: 01606 601035
<b>ICO</b>	0303 123 1113 or at <a href="https://ico.org.uk/global/contact-us/email/">https://ico.org.uk/global/contact-us/email/</a>

## Annex A

### a) The lawfulness of *processing* conditions for *personal data* are:

1. *Consent* of the individual for one or more specific purposes.
2. *Processing* is necessary for the performance of a contract with the individual or in order to take steps at the request of the individual to enter into a contract.
3. *Processing* is necessary for compliance with a legal obligation that the controller is subject to.
4. *Processing* is necessary to protect the vital interests of the individual or another person.
5. *Processing* is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the *data controller*.
6. *Processing* is necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the individual which require protection of *personal data*, in particular where the individual is a child.

### b) The lawfulness of *processing* conditions for *sensitive personal data* are:

1. Explicit *consent* of the individual for one or more specified purposes, unless reliance on *consent* is prohibited by EU or Member State law.
2. *Processing* is necessary for carrying out data controller's obligations under employment, social security or social protection law, or a collective agreement, providing for appropriate safeguards for the fundamental rights and interests of the individual.
3. *Processing* is necessary to protect the vital interests of the individual or another individual where the individual is physically or legally incapable of giving *consent*.
4. In the course of its legitimate activities, *processing* is carried out with appropriate safeguards by a foundation, association or any other not-for-profit body, with a political, philosophical,

religious or trade union aim and on condition that the *processing* relates only to members or former members (or those who have regular contact with it in connection with those purposes) and provided there is no disclosure to a third party without the *consent* of the individual.

5. *Processing* relates to *personal data* which are manifestly made public by the individual.
6. *Processing* is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.
7. *Processing* is necessary for reasons of substantial public interest on the basis of EU or Member State law which shall be proportionate to the aim pursued, respects the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and interests of the individual.
8. *Processing* is necessary for the purposes of preventative or occupational medicine, for assessing the working capacity of the employee [NOTE 21], medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of EU or Member State law or a contract with a health professional and subject to the necessary conditions and safeguards.
9. *Processing* is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of healthcare and of medicinal products or medical devices, on the basis of EU or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the individual, in particular professional secrecy.
10. *Processing* is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard fundamental rights and interests of the individual.