

# Privacy Policy

<b>Company Name:</b>	Thompson Butler Associates (The Company)
<b>Company Contact details:</b>	Mike Butler <a href="mailto:tba@grl.org.uk">tba@grl.org.uk</a> 01623 411242
<b>Document:</b>	Privacy Notice
<b>Topic:</b>	Data protection
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The Company is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process personal data (including sensitive personal data) so that it can provide these services – in doing so, the Company acts as a data controller.

You may give your personal details to the Company directly, such as on an application or registration form or via our website, or we may collect them from another source such as a jobs board. The Company must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to roles relevant to you we will only use your personal data in accordance with the terms of the following statement.

## **1. Collection and use of personal data**

### **a. Purpose of processing and legal basis**

The Company 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 and/or supplying/introducing Clients to work seekers. The legal bases we rely upon to offer these services to you are:

- Consent
- Legitimate interest
- Legal obligation
- Contractual obligation

## **b. Categories of Data**

The company has collected the following personal data on you:

- Data contained in your CV including name, address, work history, contact details such as email address and phone number, and any other information contained in your CV which may help work seeking activity.
- Further on in the recruitment process The Company will require you to provide ID (such as your passport), and fill in a registration form in order to continue in the recruitment process.
- If you are successfully placed in a position, The Company will be required to collect further sensitive data to adhere to specific Client recruitment processes, which you will be made aware of.

## **c. Legitimate interest**

Where the Company has relied on a legitimate interest to process your personal data our legitimate interests is/are as follows:

- Work finding services for Candidates, and supplying/introducing Clients to work seekers.

## **d. Recipient/s of data**

The Company will process your personal data and/or sensitive personal data with the following data processors:

## **e. Statutory/contractual requirement**

Your personal data is required by law and/or a contractual requirement (e.g. our client may require this personal data), and/or a requirement necessary to enter into a contract. You are obliged to provide the personal data and if you do not the consequences of failure to provide the data are:

- The Company will not be able to provide you with work finding services, or supplying/introducing any work seekers to you.

## **2. Overseas Transfers**

The Company may transfer only the information you provide to us to countries outside 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.

## **3. Data retention**

The Company will retain your personal data only for as long as is necessary. Different laws require us to keep different data for different periods of time.

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 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.

Where the Company has obtained your consent to process your personal and/or sensitive personal data, we will do so in line with our retention policy (click here to see a copy). Upon expiry of that period the Company will seek further consent from you. Where consent is not granted the Company will cease to process your personal and/or sensitive personal data.

#### **4. Your rights**

Please be aware that you have the following data protection rights:

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

Where you have consented to The Company processing your personal data and/or sensitive personal data] you have the right to withdraw that consent at any time by contacting Mike Butler at [tba@grl.org.uk](mailto:tba@grl.org.uk)

For more information please view the Recruitment and Employment Confederation's guide for Jobseekers "Know your data protection rights".

#### **5. Source of personal data**

The Company sourced your personal/sensitive data by one of the following means:

- From a job board where The Company have either a job advertising or CV searching license. These job boards are currently Reed, CV Library, Indeed, and Total Jobs, but are subject to change.
- From LinkedIn where The Company have been able to access your public profile

- From Facebook where The Company have been able to access your public profile
- From the Company website where you have either applied for a job, or registered on the site.

## **6. Complaints or queries**

If you wish to complain about this privacy notice or any of the procedures set out in it please contact:

**Mike Butler at [tba@grl.org.uk](mailto:tba@grl.org.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/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.