

# DATA PROTECTION POLICY

## What kind of personal data do we collect?

**Candidate data:** In order to provide the best possible employment opportunities that are tailored to you, we need to process certain information about you. We only ask for details that will genuinely help us to help you, such as your name, contact details, education details, employment history, emergency contacts, immigration status, Bank account details and national insurance number. Where appropriate and in accordance with specific client requirements, we may also collect information related to your health, references, diversity information or details of any criminal convictions.

**Client data:** If you are a Carrington West customer, we need to collect and use information about you, or individuals at your organisation, in the course of providing you services such as finding Candidates who are the right fit for you or your organisation. This will include contact details and job titles.

## How do we collect your personal data?

**Candidate data:** There are two main ways in which we collect your personal data:

Directly from you and from third parties. (Third parties will include; LinkedIn, Indeed and other job sites)

**Client data:** There are two main ways in which we collect your personal data:

Directly from you and from third parties (e.g. our Candidates) and other publically available sources (e.g. online and offline media).

## How do we use your personal data?

**Candidate data:** The main reason for using your personal details is to help you find employment or other work roles that might be suitable for you. We will not share your data with potential employers without your direct consent. The more information we have about you, your skillset and your ambitions, the more bespoke we can make our service. Where appropriate and in accordance with local laws and requirements, we may also use your personal data for things like marketing, profiling and diversity monitoring. Where appropriate, we will seek your consent to undertake these activities.

**Client data:** The main reason for using information about Clients is to ensure that the contractual arrangements between us can properly be implemented so that the relationship

can run smoothly. This may involve identifying Candidates who we think will be the right fit for you or your organisation. The more information we have, the more bespoke we can make our service.

### **Who do we share your personal data with?**

**Candidate data:** We only share your data after you have given consent to do so. We may share your personal data with various parties, in various ways and for various reasons. Primarily we will share your information with prospective employers to increase your chances of securing the job you want. If you give your consent, we may also share your information with associated third parties such as our service providers where we feel this will help us to provide you with the best possible service.

**Client data:** We only share your data after you have given consent to do so. We will share your data primarily to ensure that we provide you with a suitable pool of Candidates. If you give your consent, we may share your information with associated third parties such as our service providers to help us meet these aims.

### **How do we safeguard your personal data?**

We care about protecting your information. That's why we put in place appropriate measures that are designed to prevent unauthorised access to, and misuse of, your personal data. We are committed to the processes as set down by ISO27001 and maintain this accreditation at all times.

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

If we have not had meaningful contact with you (or, where appropriate, the company you are working for or with) for a period of two full tax years, we will attempt to contact you for consent to retain your data. If we do not receive consent within 30 days then we will delete your personal data from our systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation).

Once a contractor finishes an assignment with Carrington West their bank account details will be deleted within 3 months.

### **How can you access, amend or take back the personal data that you have given to us?**

Even if we already hold your personal data, you still have various rights in relation to it. To get in touch about these, please contact us. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

**Right to object:** If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.

**Right to withdraw consent:** Where we have obtained your consent to process your personal data for certain activities (for example, for profiling your suitability for certain roles), or consent to market to you, you may withdraw your consent at any time.

**Data Subject Access Requests (DSAR):** Just so it's clear, you have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or delete such information. At this point we may comply with your request or, additionally do one of the following:

- we may ask you to verify your identity, or ask for more information about your request; and
- where we are legally permitted to do so, we may decline your request, but we will explain why if we do so.

**Right to erasure:** You have the right to request us to "erase" your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply.

**Right of data portability:** If you wish, you have the right to transfer your data from us to another data controller. We will help with this – either by directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format.

**Right to lodge a complaint with a supervisory authority:** You also have the right to lodge a complaint with your local supervisory authority.

#### **Where we seek consent:**

- Policy Listed on Website front page and CV/Vacancy registration web pages
- Consent listed as condition on CV/Vacancy registration web pages
- Consent listed as condition to apply for all job advertisements
- Link to policy on consultant/compliance email footers along with consent listed as condition to working with CW.

- Verbal confirmation of consent during candidate registration and following every direct communication
- Verbal confirmation of consent during client registration
- Verbal/email confirmation of consent when receiving booking from client
- Verbal/email confirmation of consent when submitting candidate to booking
- Confirmation of consent on New Starter Form (includes accounts details)
- Confirmation of consent on CRR form
- Confirmation of consent on Invoices

**Model Documents:**

- Consent form
- Withdrawal of consent form

**Existing database consent procedure:**


All candidates without assumed consent will be emailed before 20<sup>th</sup> April requesting consent.

Assumed consent include:

- Where a candidate is spoken to regarding vacancies within the last 3 years (Since 20/04/2015)
- Where the candidate applies on the Carrington West website or associated job boards for any vacancy where the CV details were submitted
- Where a candidate has worked via Carrington West within the past 5 years (since 20/04/2013)

Consent renewed in three ways:

- Where the Candidate replies to the Carrington West GDPR email before 25<sup>th</sup> May 2018 reconfirming consent
- Where the Candidate adds new application to a vacancy via the Carrington West website or associated job boards
- When manually recorded in writing confirmation whilst in contact with any Carrington West employee via the phone

<b>Signed By:</b>	James Fernandes	<b>Position:</b>	Director
<b>Signature:</b>		<b>Date:</b>	16/07/2018