

PRIVACY NOTICE

Purpose

Carrington West Limited (“We”, “Us”) are committed to protecting and respecting your privacy. This Privacy Notice (together with any other documents referred to herein) sets out the basis on which the personal data collected from you, or that you provide to Us, will be processed by Us in connection with Our recruitment processes. Please read the following carefully to understand Our views and practices regarding your personal data and how We will treat it.

For the purpose of the General Data Protection Regulation (“GDPR”) the Data Controller is Lucy Rimmer. We need to process data to take steps at your request prior to entering into a contract with you. We may also need to process your data to enter into a contract with you.

In some cases, we need to process data to ensure that we are complying with its legal obligations. For example, it is mandatory to check a successful applicant's eligibility to work in the UK before employment starts.

Carrington West have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.

Carrington West may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. We may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability.

We process such information to carry out its obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, Carrington West may keep your personal data on file in case there are future employment opportunities for which you may be suited. We will ask for your consent prior to keeping your data for this purpose and you are free to withdraw your consent at any time.

Your Personal Information

Information We collect from You

We collect and process some or all of the following types of information from you:

- Information that you provide when you apply for a role. This includes information provided through an online job site, via email, in person at interviews and/or by any other method.
- In particular, we process personal details such as name, email address, address, date of birth qualifications, experience, information relating to your employment history, skills and experience that you provide to Us.
- If you contact Us, we may keep a record of that correspondence.
- A record of your progress through any hiring process that we may conduct.

Uses Made of Your Information

Lawful basis for processing

We rely on legitimate interest as the lawful basis on which We collect and use your personal data. Our legitimate interests are the recruitment of staff for Our business.

Purposes of processing

We use information held about you in the following ways:

- To consider your application in respect of a role for which you have applied.
- To consider your application in respect of other roles.
- To communicate with you in respect of the recruitment process.
- To enhance any information that we receive from you with information obtained from third party data providers.
- To find appropriate candidates to fill Our job openings.

Disclosure of Your Information

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles. We will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. We will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks.

How We Store Your Personal Data

Security

We take appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where We are legally required to do so. We take the security of your data seriously. We have internal policies and controls in place to ensure that your

data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

Unfortunately, the transmission of information via the internet is not completely secure. Although We will do Our best to protect your personal data, we cannot guarantee the security of your data transmitted through any online means, therefore any transmission remains at your own risk.

Where We store your personal data

Where we store your personal data in our own systems, it is stored on our secure servers within the EEA.

How long we keep your personal data

We will hold all the data for eight years.

Your personal information will be deleted on one of the following occurrences:

- deletion of your personal information by you (or by another person engaged by the Customer); or
- receipt of a written request by you (or another person engaged by the Customer) to us.

Your Rights

Under the **General Data Protection Regulation** you have a number of important rights free of charge. In summary, those include rights to:

- access to your personal data and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which We hold
- require the erasure of personal data concerning you in certain situations
- receive the personal data concerning you which you have provided to Us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal data concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal data
- otherwise restrict our processing of your personal data in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- contact us using our Contact details below
- let us have enough information to identify you,
- let us have proof of your identity and address, and
- let us know the information to which your request relates.

How to complain

We hope that We can resolve any query or concern you raise about Our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

Contact

All questions, comments and requests regarding this Privacy Notice should be addressed to Lucy Rimmer 02393 876 026.

Author:	Ella Razzell	Date Created:	May 2018
Authorised by:	James Fernandes	Position:	Director
Signature:		Reviewed Date:	June 2018
		Reviewed By:	Lucy Rimmer