



<b>Company Name:</b>	Change Recruitment Services Limited ('the Company')
<b>Company Contact details:</b>	Sarah Warne – Managing Director Change Recruitment Services Limited, Suite 44, Pure Offices, Pastures Avenue, St. Georges, Weston-super-Mare, North Somerset, BS22 7SB Tel: 01934 612288 Email: <a href="mailto:sarah@changerecruitmentservices.co.uk">sarah@changerecruitmentservices.co.uk</a>
<b>Document DP5A</b>	Candidate Privacy Notice
<b>Topic:</b>	Data protection
<b>Date:</b>	May 2018
<b>Version:</b>	1.0

The Company is a recruitment business which provides recruitment services to its clients and work-finding services 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.

The Company has registered with the ICO and its registration number is Z9995308.

You may give your personal details to the Company directly, such as on an application or registration form or via our website, or over the phone, or in person, 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. We might change this Candidate Privacy Notice from time to time by updating it on our website.

## 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. 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:

### Personal data

- Name
- Date of birth
- Contact details, including telephone number, email address and postal address
- Experience, training and qualifications
- CV
- National insurance number
- Passport, ID and VISA
- Birth Certificate
- Health data
- Reference data

We may need to ask you for information about your unspent criminal convictions or about criminal charges against you. We may only use information where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations.

We will only collect information about criminal convictions or charges if it is appropriate given the nature of the role and where we are legally able to do so.

## **c. Legitimate interest**

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

- Provision of work finding services

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

The Company will process your personal data and/or sensitive personal data with the following recipients in order to provide you with work finding services:

- Our clients – companies who engage Change Recruitment Services Ltd to provide temporary or permanent recruitment services
- Our payroll (Portt & co Payroll and Bookkeeping Services) provider should you undertake a temporary contract
- The referee of whom you have provided contact details

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

If you choose not to provide all or some of the relevant personal data, this may affect the work finding services we can provide.

## 2. 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 sensitive personal data, we will do so in line with **our** Data Retention Policy (available on our website). 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 data and sensitive personal data.

## 3. 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 sensitive personal data you have the right to withdraw that consent at any time by contacting:

Sarah Warne – Managing Director

Change Recruitment Services Limited, Suite 44, Pure Offices, Pastures Avenue, St. Georges, Weston-super-Mare, North Somerset, BS22 7SB

Tel: 01934 612288

Email: [sarah@changerecruitmentservices.co.uk](mailto:sarah@changerecruitmentservices.co.uk)

## 4. Source of the personal data

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

- Job boards / CV databases
- Social/business networking websites
- Email submission
- Website submission

- Registration meeting (via phone call, Skype call or face-to-face)
- Application form

## **5. Overseas Transfers (outside of the EEA)**

We will not transfer your personal data outside of the EEA.

## **6. Complaints or queries**

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

Sarah Warne – Managing Director

Change Recruitment Services Limited, Suite 44, Pure Offices, Pastures Avenue, St. Georges, Weston-super-Mare, North Somerset, BS22 7SB

Tel: 01934 612288

Email: [sarah@changerecruitmentservices.co.uk](mailto:sarah@changerecruitmentservices.co.uk)

You also have the right to raise concerns with 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.

## **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, 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.