

## Approach Personnel Privacy Policy 2019

<b>Company Name:</b>	Approach Personnel ('the Company')
<b>Company Contact Details:</b>	Unit 8 Chase Park, Daleside Road, Nottingham, NG2 4GT Tel: 01159 003171 Email: enquiries@approachpersonnel.co.uk
<b>Document:</b>	Privacy Notice
<b>Topic:</b>	Data protection
<b>Date:</b>	1 <sup>st</sup> May 2018
<b>Version:</b>	1

The Company is a recruitment business which provides work-finding services to its clients and work seekers. The Company must process personal data (which may include sensitive personal data) so that it can provide these services. In doing so, the Company acts as a data controller.

### Examples of data we may collect from you:

#### Personal data

- ◆ Name
- ◆ Date of birth
- ◆ Contact details, including telephone number, email address, postal address
- ◆ Experience, training and qualifications
- ◆ C.V
- ◆ National insurance number
- ◆ Identification
- ◆ Other relevant personal data

#### Sensitive personal data

- ◆ Disability/health condition relevant to the role
- ◆ Any unspent criminal convictions

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 and will process your personal data for the purposes of providing you with work-finding services. This includes for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities, arranging payments to you and developing and managing our services and relationship with you and our clients.

In some cases, we may be required to use your data for the purpose of investigating, reporting and detecting crime and also to comply with laws that apply to us. We may also use your information during the course of internal audits to demonstrate our compliance with certain industry standards.

The legal bases we rely upon to offer these services to you are:

- ◆ Your consent
- ◆ Where we have a legitimate interest
- ◆ To comply with a legal obligation that we have
- ◆ To fulfil a contractual obligation that we have with you

### b. Legitimate interest

This is where the Company has a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect from us. Where the Company has relied on a legitimate interest to process your personal data our legitimate interests is/are as follows:

- ◆ Finding you suitable temporary work assignments;
- ◆ Sending your details to third party payroll service providers or umbrella companies in order to get you registered for work and weekly payments;
- ◆ Finding you a suitable permanent job;
- ◆ Managing our database and keeping work-seeker records up to date;
- ◆ Contacting the you to seek your consent where we need it;
- ◆ Providing work finding services to you, including sending your information to our clients where you have demonstrated an interest in doing a particular type of work;
- ◆ Contacting you with information about job opportunities that we feel may be of interest to you;
- ◆ Passing on work references to future employers where requested;

### c. Recipient/s of data

The Company may process your personal data and/or sensitive personal data with the following recipients:

- ◆ Approach Personnel clients that we introduce or supply individuals to;
- ◆ Your former or prospective employers in order to obtain or provide references;
- ◆ The Recruitment and Employment Confederation or any other trade body who may have access to your data;
- ◆ Any other third parties who carry out audits to ensure that we run our business correctly;
- ◆ Third party payroll service providers or umbrella companies who will manage your weekly payment;
- ◆ Other recruitment agencies in the supply chain (e.g. master/neutral vendors and second tier suppliers);

- ❖ Our insurers;
- ❖ Our legal advisers;
- ❖ Social networks;
- ❖ Our IT and CRM providers;
- ❖ Public information sources and third-party organisations that we may use to carry out suitability checks on work-seekers e.g. Companies House, the Disclosure and Barring Service (DBS), National College for Teaching and Leadership (NCTL), Nursing and Midwifery Council (NMC), General Medical Council (GMC), DVLA, credit reference agencies;
- ❖ Government, law enforcement agencies and other regulators e.g. the Police, Home Office, HMRC, Employment Agencies Standards Inspectorate (EASI), Local Authority Designated Officers (LADOs), GLAA.

#### **d. Statutory/contractual requirement**

Your personal data is required by law and/or a contractual requirement (e.g. Right to work Identification and/or another 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:

- ❖ We cannot offer work finding services to you.

## **2. Data retention**

The Company will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time.

We must also keep your payroll records, holiday pay, sick pay and pension's 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 data, we will do so in line with our retention policy. 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.

## **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 you have the right to withdraw that consent at any time by contacting our head office administration team.

The contact details to use are Email: [enquiries@approachpersonnel.co.uk](mailto:enquiries@approachpersonnel.co.uk), Tel: 01159 003171, Address: Unit 8 Chase Park, Nottingham, NG2 4GT.

There may be circumstances where the Company will still need to process your data for legal or official reasons. We will inform you if this is the case. Where this is the case, we will restrict the data to only what is necessary for the purpose of meeting those specific reasons.

If you believe that any of your data that the Company processes is incorrect or incomplete, please contact us using the details above and we will take reasonable steps to check its accuracy and correct it where necessary.

**You can also contact us using the above details if you want us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.**

#### **4. Complaints or queries**

If you wish to complain about this privacy notice or any of the procedures set out in it please contact our head office administration team. The contact details to use are:

Email: [enquiries@approachpersonnel.co.uk](mailto:enquiries@approachpersonnel.co.uk)  
Tel: 01159 003171  
Address: Unit 8 Chase Park, Nottingham, NG2 4GT

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.