Data Protection and Privacy Policy

As a recruitment company The Simon Pinnell Partnership Ltd process personal data in relation to our own staff, candidates and client contacts. It is therefore our intention to abide by the principles of (GDPR) as set out below.

This Policy explains what we do with the personal data you provide, how we use it and how we keep it safe. We will also explain your rights in respect of the personal information we hold.

Explanation of Terms regarding General Data Protection Regulation (GDPR)

Data Controller - an organisation that collects data from EU residents (Simon Pinnell Partnership Ltd and the Client when an offer is made)

Processor - an organisation that processes data on behalf of a Data Controller (like cloud service providers, back up storage, outsourced payroll department)

Data Subject – person (candidate, client, employee)

Personal Data is any information relating to an individual and their private, professional or public life Such as the following identifiable information:

- Name
- Home address
- Photo
- Email address
- Bank details
- Posts on social networking websites
- Medical information
- Computer's IP address

Processing - obtaining, recording or holding data or carrying out any operations or set of operations on the data. It applies to any processing including any type of computer however described, main frame, desktop, laptop etc

Handling of Your Personal Data

As a Data Controller SPP ltd will process your personal data in accordance with the following principles of GDPR – personal data will be:

- Fairly and Lawfully Processed
- Processed for Limited Purposes
- Adequate, Relevant and Not Excessive
- Accurate
- Not Kept Longer Than Reasonably Necessary
- Processed in Accordance with the Data Subjects Rights
- Kept Securely
- Not Transferable to Countries Outside the European Economic are Without Adequate Protection.

Why do we have your Data?

The Simon Pinnell Partnership Ltd processes personal data only for the specific purposes for which it has submitted it to us with the consent of the data subject. If we intend to use your data for any other purpose, we must obtain your specific consent.

<u>Candidates</u> - by submitting your personal data contained in your CV or public social media profile, you are giving consent to us processing your details for the purposes of finding you new employment.

<u>Clients</u> - you are permitting us to process your personal data such as name, job title and contact details for the purposes of us providing you with a professional service

<u>Employees</u> - you are permitting us to process your personal data in order to carry out our legal and professional responsibilities to you as your employer

What Personal Data?

We may collect and process any personal data about you from email, text, telephone calls, other written or verbal communications, CV submission or via our website.

We would usually keep a record of your contact details and details of any job opportunities we discuss with you. We may supplement this information with other information that we obtain from our contact with you such as email address, salary, address, contact details and work history. This record of data will be stored by us and will be accessible by relevant employees of the company.

We may also process information about you where it is available from public sources such as if you have a professional profile on line or an article in the press and we may combine that type of information with the information you provide directly to us.

How long will we hold this information?

We are required by law to hold your information for as long as is necessary to comply with our statutory and contractual obligation and in accordance with our legitimate interests as a data controller. As the majority of candidates seek new opportunities every 2-3 years and find it helpful for us to provide them with their CV that can easily be updated we will hold candidate details on our database for 4 years and 6 years for our employee records.

We will use reasonable endeavours to ensure that your personal data is maintained and up to date and will keep your record live and up to date should you specify during regular contact. We will of course remove your records from our database at your request.

Contact

We will primarily use your personal information to provide recruitment services to you. From time to time we would like to contact you to invite you to network events, to ask you to meet with peers who are considering roles within your organisation and to discuss new possible opportunities, whenever you wish us to cease contact, just ask and we will of course remove your records from our database.

Data Safety

At the Simon Pinnell Partnership Ltd we appreciate that when you share your Personal Data with us you trust us to look after it. CV's and other identifiable data records are always handled with utmost discretion and care. We have procedures in place to ensure that our computer systems and databases are protected against unauthorised use, loss and damage. Should any breach be detected we shall inform those affected within 48 hours of discovery.

Your Rights

As a Data Subject you have the right to a copy of the information we hold about you on our systems, and you have the right to have your details and information removed. Please contact <u>kate@simonpinnell.com</u> and we will respond within 48 hours of your request.