

Privacy Notice

Grace Personnel Ltd takes its Data Protection responsibilities seriously and we are committed to using the data we hold in accordance with the law. The following explains how and why we collect your personal data and what we plan to do with it as well as outlining your privacy rights under GDPR which will take effect as of 25th May 2018. Please read the following carefully to understand our practices regarding your personal data.

Data Controller

Grace Personnel Ltd (Company Registration Number 3749697 and Information Commissioner's Office 'ICO' Registration Number Z8507520)

Address - 69 High Street, Maidenhead, Berks, SL6 1JX

Telephone - 01628 627 222

www.gracepersonnel.com

If you have queries about this privacy notice or wish to exercise any of the rights mentioned in it please contact dataprotection@gracepersonnel.com

Definitions

"Candidates" includes applicants for all roles advertised or promoted by Grace Personnel, including permanent, contract and temporary positions with clients; as well as people who have supplied a speculative CV to Grace Personnel not in relation to a specific job.

"Clients" while it speaks for itself, this category covers our customers, clients, and others to whom Grace Personnel provides services in the course of its business.

"Cookies" means a piece of information that is stored on your computer's hard drive and which records your navigation of a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit.

"Data Controller" means a person who determines the purposes for which any personal data are to be processed.

"General Data Protection Regulation (GDPR)" a European Union statutory instrument which aims to harmonise European data protection laws. It has an effective date of 25 May 2018, and any references to it should be construed accordingly to include any national legislation implementing it.

"Personal Data/Information" means information that is about you or from which we can identify you.

"Processing" means obtaining, recording or holding the data or carrying out any operation on the data including erasure, disclosure, retrieval or alteration.

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"Sensitive data" means personal data consisting of information as to racial or ethnic origin, sexual life, physical or mental health, religious beliefs, political opinions and any proceedings for offences committed.

"Suppliers" refers to partnerships and companies who provide services to Grace Personnel.

Personal Data We May Collect

We will collect personal data on clients, candidates, temporary workers, suppliers, referees, emergency contacts and consultants.

Data collected may include (but is not limited to):

Candidate Data:

- Name
- DOB
- Photograph
- Contact details
- Gender
- Marital status
- Right to work in the UK - passport/identity card/birth certificate
- Education details
- Employment details
- Tax related information (NI)
- Referee details
- Nationality
- Work permit details
- Banking/Financial information (for background checks or to process payroll)
- Links to your profiles available in the public domain (e.g. LI, FB, Twitter)
- Criminal conviction details (if required)
- Disability-related information
- Details about your current benefits/salary arrangements
- Information your referees choose to tell us

Client Data:

- We only require contact details or details of the individual contacts at your organisation (name, phone number, address, email, corporate website) to ensure our professional relationship runs smoothly
- We may hold extra information that someone in your organisation has chosen to tell us
- Company reg. number and financial information (where we need to carry out a credit check)

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Supplier Data/Referees/Emergency Contacts:

- We collect details for our contacts within your organisation (name, phone number, address, email)
- Bank details so that we can pay you
- We may hold extra information that someone in your organisation has chosen to tell us
- Emergency contacts and referee details (name, email, phone number)

How is it Collected

Candidate Data:

We will collect candidate data in two main ways:

- Directly from you;
 - Entering your details on an application form as part of the registration process
 - Handing us your hard copy CV on site or at an event
 - Being interviewed by a Grace Consultant
 - Applying for jobs through a job site
 - Emailing your CV to the Grace team
- Other sources;
 - Third party sources such as LinkedIn and other job sites
 - Referees may disclose information about you
 - Personal recommendations
 - Clients or a Recruitment Process Outsourcing (RPO)/Managed Service Provider (MSP) supplier may share information

In this instance we will inform you, by sending you this privacy notice, no later than 30 days of collecting your data that we hold your data, the source the data originates from and for what purpose we intend to process the data.

Client Data:

We will collect client data in two main ways:

- Directly from you;
 - Where you proactively contact us by phone/email
 - Where we contact you through business development activities
- Other sources; (we may seek more information about you by way of due diligence)
 - From other limited sources and third parties (for example from our candidates if they provide us with your details to act as a referee for them).
 - By researching online and offline media

Why is it Being Collected

We use it in a number of ways:

- Recruitment activities – to help candidates find employment and to fulfil contractual agreements with clients
- Marketing activities
- To exercise legal claims
- Make contact in the case of an emergency

Who do we Share your Personal Data With

Where appropriate we may share your personal data with:

- Clients to introduce candidates to them
- Candidates to arrange interviews and engagements
- Third party service providers who perform functions on our behalf (including accountants, lawyers)
- Payment or any other financial service providers (debt recovery teams, HMRC, Sage payroll)
- Third party outsourced IT providers where we have a processing agreement in place
- RPO/MSP suppliers as part of our clients' arrangements
- Credit reference agencies to assess your suitability for a role
- Individuals or organisations who hold information related to your reference or application to work (other recruitment agencies or past employers)
- If Grace Personnel merges with, or is acquired by, another business in the future we may share your data with the new owners

Your Rights

Here is a list of your individual rights under GDPR laws (they do not apply in all circumstances):

- The right to **be informed** about the personal data we process on you;
- The right to have your personal information **corrected if it is inaccurate**;
- The right to **have your personal information erased** (the "right to be forgotten");
- The right to **restrict processing** of your personal data;
- The right to **object** to processing of your personal data;
- The right to **move, copy or transfer your personal data** ("data portability");
- The rights in relation to **automated decision making which has a legal effect or otherwise significantly affects you** (we mention this right here for completeness but we do not carry out automated decision making and so in practice this right will not be relevant to you)

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- The right to withdraw consent at any time. [Click here to opt-out of all communication.](#)

Please contact dataprotection@gracepersonnel.com (or contact details at the top of this Privacy Notice) if you wish to exercise any of these rights if and to the extent they are relevant.

Data Access Rights

You have the right to access information we are processing and obtain information about how we process it (subject access request). A copy will be sent to you no later than one month from when we received your request. We will not charge you for providing you with the information but may charge you a reasonable fee for supplying any additional copies.

Please apply using the reference Subject Access Request:

- **By post** to Grace Personnel Ltd, 69 High Street, Maidenhead, Berks, SL6 1JX
- **By email** to dataprotection@gracepersonnel.com

Please note that where the request is received via email, security checks will be conducted prior to release of any information.

Our Legal Basis for Processing Your Data

We will collect and process your personal data (which may include sensitive personal data) for the purposes of providing you with work-finding services. The legal basis we rely upon to offer you these services are:

- **Consent**

Should we want or need to rely on consent to lawfully process your data we will request it by email or an online opt-in process and record your response on our system. 'Opt-in' consent means you have given us consent freely without pressure, that you know what you are consenting to and that you have given positive and affirmative action in giving us consent (we're likely to provide a tick box so that it is unambiguous).

You have the right to withdraw your consent to processing at any time, please [click here](#).

- **Legitimate Interest**

Under data protection law there are some circumstances where we may rely on a legitimate interest to process your personal data. We can do this if we have a genuine and legitimate reason and we are not harming your rights and interests.

We don't think any of the following activities harm your fundamental rights – in fact, they help us to provide a more efficient and tailor-made service.

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- In order for us to continue providing services to candidates and clients we need to process your data for internal administration including payroll and invoicing.
- We think it's reasonable to expect that if you've posted your information and CV on a job board or professional site, you are happy for us to collect and/or use your data to offer our services to you.
- We introduce candidates to clients for permanent and temporary employment and therefore the sharing of data is an essential part of this process in helping you secure the job you want.
- To allow us to make relevant job offerings and help you with your search for work we think it's reasonable for us to process your data.
- We have our own obligations under the law and therefore may share your data in relation to tax collection, crime detection or litigation cases.
- For us to provide the best possible recruitment service to clients we store your personal data and from time to time send candidate assessments for you to complete.
- We store supplier data to enable the receipt of services from you as well as financial details to pay you for your services.
- As an emergency contact, we will use these details to contact you in the case of an emergency. We are sure you will agree that this is a vital element of our people-orientated organisation.
- As a referees, we use your personal data in order to contact you for a reference. This is a part of our quality assurance procedure and so we deem this to be necessary for our legitimate interests

Third Party Websites

This privacy policy applies only to personal data collected and processed by Grace Personnel. We are not responsible for the privacy of any third party websites or services.

Data Retention

Grace Personnel will retain your personal data only for as long as we need it for our legitimate business interests, is consistent with the law and that you're happy for us to do so. Different laws require us to keep different data for different periods of time.

To ensure our data is accurate, we keep in touch with you so that you can let us know of any changes to your personal data.

We must also keep your payroll records, holiday pay, sick pay and pension auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation.

Employee personal data and contracts will be held for the duration of employment and then for 6 years after the last day of contractual employment.

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Personal data relating to pensions auto-enrolment are kept for 6 years and payroll information is kept for 3 years plus the current tax year.

In all other circumstances if you have had no 'meaningful communication' with Grace Personnel for at least five years we will ensure that all your personal data is deleted. When we refer to 'meaningful communication' we mean communication between us where you are actively engaging with our services (e.g. submitting your CV or discussing potential roles). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected.

Cookies

Our website only uses Google Analytics as a way of data processing and does not collect data by any other means. We use cookies to do two things:

- To track your use of our website. This enables us to understand how you use the site and helps us to develop and improve our website and services in response to what our visitors want; and
- To help us advertise jobs to you that we think you'll be interested in.

Cookies do not provide us with access to your computer or any information about you, other than that which you choose to share with us. Cookies can also be controlled by functions within your browser.

Data Storage

All data is held in-house using various servers. We do not store personal data outside of the UK. Data security is of great importance to Grace Personnel and to protect your data we have put in place suitable electronic procedures.

Changes to our Privacy Notice

Grace Personnel reserves the right to amend this privacy notice as we deem necessary or as may be required to by law. Such modifications shall be effective immediately upon posting on this website. Any substantive changes will be announced on the site and a notification by way of email will be sent.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Grace Personnel please contact Lynda Winterflood dataprotection@gracepersonnel.com 01628 627222.

You also have the right to raise concerns with the ICO on 0303 123 1113 or at <https://ico.org.uk/concerns/>, if you believe that your data protection rights have not been adhered to.