

Holden Jones Limited - Privacy Policy

This Privacy Policy (“**Policy**”) describes how **Holden Jones Limited** (we, us, our or Holden Jones) may use, process, store and disclose Personal Information that we may collect about individuals, including if you register with us and from other sources, such as when you apply for a job through job sites such as Reed, CV Library, Indeed and GAAP Web. The types of data we collect are described in the section below ‘**Your Personal Information and how we collect it**’.

We act as a controller and we are responsible for the Personal Information we process. This Policy informs you how we protect your Personal Information and informs you about your privacy rights.

It is important that you read this Policy together with any other Privacy Policy we may provide and on specific occasions when we are collecting or processing your Personal Information so that you are fully aware of how and why we are using your Personal Information. This Privacy Policy supplements other Policies you may receive from us and is not intended to override them.

Contact Details

If you have any questions about how we use your Personal Information, contact us at enquiries@holdenjones.com

Your Personal Information and how we collect it

Registering as a candidate for work finding services

We will collect your Personal Information directly from you and from other sources including when you apply for a job via a job board, directly through our website, from social media sites such as LinkedIn, Facebook and Twitter or when you provide us with your details during promotional, networking or training event. When you ask us to provide you with work finding services we will ask you to register as a candidate. During our candidate registration process we will collect your Personal Information directly from you, your CV, from employment and educational referees and via online tests you may perform at our request. Our clients may request additional Personal Information about you in relation to their job vacancies and requirements. The categories of Personal Information we may collect include:

- your identity (your full name, previous names, evidence of change of name); gender, date of birth and marital status);
- evidence of your right to work in the UK which may include a photograph, nationality, place of birth, birth certificate, driving licence, etc (in accordance with Home Office requirements);
- contact details including your email, home address and phone numbers;
- bank account and national insurance number (so we can make payments to you and account for tax if you are working as a temporary worker supplied through Holden Jones)
- your job search criteria, preferences and expectations;
- your qualifications, skills, experience and training;
- current remuneration and other benefits;
- educational history;
- employment history;
- details of employment or educational referees;
- references;
- details of disabilities (where you provide this and it is relevant);
- unspent criminal / motoring convictions, court proceedings and pending court proceedings relating to an offence committed or alleged to have been committed by you;
- other information contained in your CV or that you choose to provide to us.

To provide you with work finding services our recruitment consultants may send you emails containing job opportunities that match your job search criteria and preferences. From time to time you may also receive job alerts which our consultants consider you may find interesting.

Details about your health, unspent criminal or motoring convictions, court proceedings, or any pending proceedings relating to an offence committed or alleged to have been committed by you is only processed if it is relevant (for example to enable us to assess whether these present grounds for not taking your candidate registration or job application further) and in accordance with the restrictions imposed by law. We may be obliged to disclose unspent convictions and criminal proceedings to our clients so that they can determine if these are relevant to your suitability for a role within their organisation.

Our Clients and Suppliers

If you are a client or supplier of goods and services we will collect and process information about individuals in your organisation to enable us to communicate with them and to provide our services or receive goods and services. Usually we process the individual's name and business contact data only.

How we use your Personal Information

We use, process, store and disclose your Personal Information and other data we collect including during our candidate registration process, to provide you with work finding services. Holden Jones will process your Personal Information applicable to the type of work you are seeking and we will disclose your Personal Information to our clients in relation to their job vacancies. We will also process your Personal Information for other legitimate business purposes such as producing statistics, analysing how successful marketing campaigns are, the number of visitors to our website and complying with other contractual, legal and regulatory obligations and duties.

Change of Purpose

We will only use your Personal Information for the purposes for which we collected it (e.g. the provision of work finding services if you are a candidate or to consider you for employment if you are a job applicant). If we need to use your Personal Information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We may process your Personal Information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosing your Personal Information to third parties

To the extent necessary or appropriate and without notifying you, Holden Jones may disclose your Personal Information to external third parties in the following circumstances:

- to companies and individuals we employ to perform business functions and services on our behalf. Examples of service providers include: providing payroll services to enable us to pay our employees and temporary workers who work on client premises; background screening and verification services; data storage facilities including in the Cloud; hosting our Web servers; analysing data and producing statistics and legal, accounting, audit and other professional services.
- to government agencies including: HM Revenue & Customs; UK Border Agency; Home Office; Police and other law enforcement agencies; regulatory and supervisory authorities (such as the UK Information Commissioner); credit reference agencies; the Disclosure and Barring Service; and third parties performing sanctions and terrorism checks.
- to comply with applicable laws, the service of legal process, or if we reasonably believe that such action is necessary to: (a) comply with the law requiring such disclosure; (b) protect the rights or property of Holden Jones or its group companies; (c) prevent a crime, protect national security or for fraud detection or prevention; or (d) protect the personal safety of individuals using our website or members of the public.
- to third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, we will let you know.
- to IT consultants carrying out testing and development work on our IT systems, service providers who we may appoint as data processors and to other service providers.

Where applicable, we will impose appropriate contractual, security, confidentiality and other obligations on to 3rd party service providers and processors we have appointed, based on the nature of the services they provide to us. We will only permit them to process your Personal Information in accordance with the law and our instructions. We do not allow them to use your Personal information for their own purposes and when our relationship ends we will ensure your Personal Information is securely returned or destroyed.

Some of these third parties are also controllers responsible for processing your Personal Information for their purposes, for example, HM Revenue & Customs is a controller for tax purposes. We may not be able to impose obligations or restrictions on these controllers in connection with how they process your Personal Information.

Keeping your Personal Information Secure

We have put in place appropriate security measures to prevent your Personal Information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Information to those employees, agents, contractors and other third parties who have a business need to do so.

We have put in place procedures to deal with any suspected Personal Information breaches and we will notify you and the applicable supervisory authority of a breach where we are legally required to do so.

How long we retain your Personal Information

Holden Jones will retain your Personal Information for as long as necessary to fulfil the purposes that we collected it for. This means we will keep your Personal Information throughout the period of your relationship with us and whilst we are providing you with work finding services.

If you no longer wish to receive our services we will continue to retain your Personal Information on our candidate database for a further period of two years after our relationship ends, so that we can comply with our regulatory obligations. However we will archive your candidate record and limit access to your Personal Information during this period. After the two year retention period expires, we will delete your record from our database.

We are required by law to keep basic information about our candidates, clients and customers (including contracts, evidence of identity, financial and transaction data) for up to seven years from when our relationship ends, for legal, compliance and tax purposes.

Where there is no retention period stated in law, we determine the appropriate retention period for Personal Information by considering the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorised use or disclosure of the data, the purposes for which we process it and whether we can achieve those purposes through other means, and the applicable legal requirements.

Your Legal Rights

You have the right to:

Make a **Data Subject Access Request** to access your Personal Information at any time. This enables you to receive a copy of the Personal Information we hold about you and to check that we are lawfully processing it.

Request correction of the Personal Information that we hold about you. This enables you to have any incomplete or inaccurate Personal Information we hold about you corrected, although we may need to verify the accuracy of the new data you provide to us.

Request erasure / deletion / removal of your Personal Information. This enables you to ask us to delete or remove your Personal Information where we do not have a valid reason to continue to process it. You also have the right to ask us to delete or remove your Personal Information where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your Personal Information to comply with local law. Please Note: we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your Personal Information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your Personal Information. This enables you to ask us to suspend the processing of your Personal Information in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to process it.

Data Portability / Request the transfer of your Personal Information to you or directly to another controller. This right only applies to automated information which you initially provided consent for us to use or where we used the Personal Information to perform a contract with you. We will (unless there is an exemption) assist you by securely transferring your Personal Information directly to another controller where technically feasible or by providing you with a copy in a structured commonly used machine readable format.

Withdraw consent at any time where we are relying on your consent to process your Personal Information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

Additional information, response times and fees

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Information (or to exercise any of your other rights or when you make an informal request). This is a security measure to ensure that Personal Information is not disclosed to any person other than the individual who has the right to receive it. We may also contact you to ask you for further information in relation to your request to help us locate your data and to speed up our response.

We try to respond to all legitimate requests within one month. It may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You will not have to pay a fee to exercise any of these rights. However, we may charge a reasonable fee if your request is unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

The legal basis for processing your Personal Information

We have set out a short description of the main ways we will collect, store, process, share and disclose your Personal Information and the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate.

We will only use your Personal Information when the law allows us to. Most commonly, we will use your Personal Information in the following circumstances:

- To fulfil a contract we are about to enter into or have entered into with you;
- Where it is in our legitimate interests;
- When it is our legal or regulatory duty;
- When you consent.

A legitimate interest is when we have a business or commercial reason to use your information in conducting and managing our business. We will consider and balance any potential impact on you and your legal rights when we process your Personal Information for our legitimate interests.

Links to other websites

Our website may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party websites and are not responsible for their privacy statements.

Feedback and Complaints

You have the right to make a complaint at any time to the UK supervisory authority for data protection issues, the Information Commissioner's Office (ICO), (www.ico.org.uk). We would ask you to provide us with the opportunity to discuss your concerns with you before you contact the ICO so please contact: Emma Donnison, Holden Jones Ltd, Siena Court, Broadway, Maidenhead, Berkshire SL6 1NJ. Tel: 01628 244 440

Changes to this Privacy Policy

If we change this Privacy Policy we will post any updates here for your review.

This **Privacy Policy** was last updated: **15 May 2018**.