

Kingsley Search & Selection Limited **Privacy Policy**

Kingsley Search & Selection Limited (“we”) are committed to protecting and respecting your privacy. This privacy policy sets out how we use, protect and process any information that we collect from you or that you provide to us.

Kingsley Search & Selection Limited, trading as Kingsley Search & Interim, is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using our recruitment services, then you can be assured that it will only be used in accordance with this privacy statement.

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) replaces the Data Protection Regulation (Directive 95/46/EC). The Regulation aims to harmonise data protection legislation across EU member states, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

Even though the UK expressed its intention to leave the EU in March 2019, the GDPR became applicable in the UK from 25th May 2018. The Government intends for the GDPR to continue in UK law post-Brexit and has also introduced a Data Protection Bill to replace the current Data Protection Act in due course.

Your new rights under the GDPR are set out in this notice.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of data protection legislation in force from time to time the data controller is Kingsley Search & Selection Limited of Cholsey Grange, Ibstone, Bucks, HP14 3XT.

Who we are and what we do

We are a recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 (Kingsley Search & Selection Limited). We collect the personal data of the following types of people to allow us to undertake our business;

- Prospective and placed candidates for permanent roles;
- Prospective and live client contacts;
- Supplier contacts to support our services;
- Employees, consultants, temporary workers;

We collect information about you solely for the purposes of carrying out our core business and ancillary activities.

Information you give us or we collect from you

This is information about you that you give us by corresponding with us by phone, e-mail, in person, or otherwise.

The information you give us or we collect about you may include your name, address, private and corporate e-mail address and phone number, recruitment history, financial information, compliance documentation and references verifying your qualifications and experience and your right to work in the United Kingdom, curriculum vitae and photograph, links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website.

Information we obtain from other sources

This is information we obtain about you from other sources, in particular personal referrals or recommendations. Other examples could include LinkedIn, corporate websites, job board websites, online CV libraries and your business card.

Purposes of the processing and the legal basis for the processing

We use information held about you in the following ways:

- To carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us and to provide you with the information, products and services that you request from us or we think will be of interest to you because it is relevant to your career or to your organisation.
- To provide you with information about other services we offer that are similar to those that you have already purchased, been provided with or enquired about.

The core service we offer to our candidates and clients is the introduction of candidates to our clients for the purpose of temporary or permanent engagement. However, our service expands to supporting individuals throughout their career and to supporting businesses' resourcing needs and strategies.

Our legal basis for the processing of personal data is our legitimate business interests, described in more detail below, although we will also rely on contract, legal obligation and consent for specific uses of data.

We will rely on contract if we are negotiating or have entered into a placement agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.

We will rely on legal obligation if we are legally required to hold information on to you to fulfil our legal obligations.

We will in some circumstances rely on consent for particular uses of your data and you will be asked for your express consent, if legally required. Examples of when consent may be the lawful basis for processing include permission to introduce you to a client (if you are a candidate).

Our Legitimate Business Interest

Our legitimate interest in collecting and retaining your personal data is described below:

As a recruitment business and recruitment agency we introduce candidates to clients for permanent employment, temporary worker placements or independent professional contracts. The exchange of personal data of our candidates and our client contacts is a fundamental, essential part of this process.

In order to support our candidates' career aspirations and our clients' resourcing needs we require a database of candidate and client personal data containing historical information as well as current resourcing requirements.

To maintain, expand and develop our business we need to record the personal data of prospective candidates and client contacts.

Data is maintained on an ongoing basis to ensure accuracy and currency.

Consent

Should we want or need to rely on consent to lawfully process your data we will request your consent orally, by email or by an online process for the specific activity we require consent for and record your response on our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.

Automated Decision Making

We do not undertake automated decision making or profiling. We do use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision making process.

Security and controlling your personal information

We are committed to ensuring that your information is secure although clearly we cannot guarantee that the transmission of information via the internet is completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to us; any transmission is at your own risk. Once we have received your information, in order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

We take reasonable steps to keep the personal data we possess accurate and to delete incorrect or unnecessary personal data. With respect to the processing of your Personal Data, you will always have the rights as provided by applicable local law. In addition, this Policy provides you the right to know what personal data we hold about you; to request incomplete, incorrect, unnecessary or outdated personal data deleted or updated as well as to object to Kingsley Search & Selection Limited's processing of your Personal Data on compelling legitimate grounds. There may be certain categories of information prescribed by applicable local law that we may lawfully withhold.

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about roles and market information which we think you may find interesting if you consent for Kingsley Search & Selection Limited to do so.

Retention of your data

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate business interests and that you are happy for us to do so. Accordingly, upon GDPR legislation on the 25th May 2018 we will have a data retention notice and run data routines to remove data that we no longer have a legitimate business interest in maintaining.

We segregate our data so that we keep different types of data for different time periods. The criteria we use to determine whether we should retain your personal data includes:

- the nature of the personal data;
- its perceived accuracy;
- our legal obligations;
- whether an interview or placement has been arranged; and
- our recruitment expertise and knowledge of the industry by country, sector and job role.

We may archive part or all of your personal data or retain it on our financial systems only, deleting all or part of it from our main Customer Relationship Manager (CRM) system. We may pseudonymise parts of your data, particularly following a request for suppression or deletion of your data, to ensure that we do not re-enter your personal data on to our database, unless requested to do so.

For your information, Pseudonymised Data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms.

Changes of Business Ownership & Control

Should we be sold, data may be disclosed to a third party who acquires us, and the new owner or new controlling party will, under the terms of this Policy, be permitted to use the Data for the purposes for which it was supplied by you.

In the event that any Data submitted by Users will be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will be given the choice to have your Data deleted or withheld from the new owner or controller.

Your rights

You may choose to restrict the collection or use of your personal information in the following ways:

- if you have previously agreed to Kingsley Search & Selection Limited using and or storing your personal information you may change your mind at any time by writing to or emailing us at datacontroller@kingsleysearch.com or Cholsey Grange, Ibstone, Bucks, HP14 3XT

Under the GDPR and Kingsley Search & Selection Limited policies and procedures you have the right to:

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- **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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party in certain formats, if practicable.

The Data Protection Act 1998 and the GDPR give you the right to access information held about you. We also encourage you to contact us to ensure your data is accurate and complete. For any of the above please write to Kingsley Search & Selection Limited at Cholsey Grange, Ibstone, Bucks, HP14 3XT or email datacontroller@kingsleysearch.com. If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

Kingsley Search & Selection Limited may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 25/05/2018