## **PRIVACY POLICY**

This notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a new regulation which 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.

## The Information we collect

To carry out our core recruitment activities, we collect information about you which may include: your name, address and post code; private and corporate e-mail address and phone number; financial information and compliance documentation; references verifying your qualifications and experience and your right to work in the United Kingdom; curriculum vitae and photograph; employment details and preferences; links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, Facebook for Business or corporate website.

## How we collect this information

The information we collect about you will be provided by you, either by filling out a form on our website <u>www.chamberslondon.co.uk</u> or by corresponding with us by phone, e-mail or otherwise. It will also include information you provide when you register to use our website, subscribe to our services, attend our events, participate in discussion boards or other social media functions on our website, enter a competition, promotion or survey, and when you report a problem with our site.

We may also obtain information about you from other sources such as LinkedIn, corporate websites, job board websites, online CV libraries, your business card, personal recommendations, and any relevant social media sites. In this case – and within 30 days of collecting – we will inform you that we hold this personal data, the source the data originated from, whether it came from publicly accessible sources, and for what purpose we intend to retain and process your personal data.

## Our legal basis for processing data

Our legal basis for the processing of personal data is:

We will need to process your personal data for the purposes of providing recruitment and related services to our clients, and workfinding and related services to work-seekers.

The legal bases upon which we may rely to process your personal data are:

- Contractual obligation
- Legal obligation
- Legitimate interest
- Consent

We need to process certain categories of your personal data in order to enter into an agreement with you and to comply with our obligations under that agreement.

We are also required to process certain categories of personal data in order to comply with our legal obligations under relevant legislation, including HMRC, Nest Pension Provider, and Department of Social Security. You are not under any obligation to provide us with your personal data, but if you do not we may be unable to meet our legal obligations and so may not be able to provide you with work-finding or recruitment services.

Our business involves providing work-finding and related services to work-seekers and recruitment and related services to our clients and so we may need to process your personal data in order to pursue our legitimate interests in achieving this. We may also need to retain personal data in case we need to establish or defend a legal claim.

We rely on your consent in certain circumstances, for example to process your data for the purposes of sending you direct marketing by email or text message, to use cookies when you visit our website, or to process sensitive personal data.

The bases upon which we may lawfully process your personal data are listed in the table below, with the most appropriate basis listed first.

Document / Personal Data	Why we need it	Our lawful ground for processing it
Name, address, DOB	To verify your identity and CV or employment history, qualifications and authorisations	Legal obligation (if applicable). Contractual obligation (if applicable). Legitimate interests.
Contact details	To communicate with you	Legal obligation (if applicable). Contractual obligation (if applicable). Legitimate interests.
Role requirements	To find you the right role or assignment	Legal obligation (if applicable). Contractual obligation (if applicable). Legitimate interests.
CV, employment history, qualifications, authorisations	To check your suitability for a role or assignment	Legal obligation (if applicable). Contractual obligation (if applicable). Legitimate interests.
ID and immigration checks	To verify your identity and right to work	Legal obligation (if applicable). Contractual obligation (if applicable). Legitimate interests.
Confirmation that you are willing to work in a particular role	To find you the right role or assignment	Legal obligation (if applicable). Legitimate interests.
Interview details	To set up interviews with hirers	Contractual obligation (if applicable). Legitimate interests.

Notes, assessments, comments, feedback from interview.	To find you the right role or assignment	Contractual obligation (if applicable). Legitimate interests.
Emails and correspondence with you and with potential hirers and intermediaries	To find you the right role or assignment	Contractual obligation (if applicable). Legitimate interests.
References (collected from third parties with your prior consent)	To verify your experience and suitability for a particular role or assignment	Legal obligation (if applicable). Contractual obligation (if applicable). Legitimate interests.
Details of placement/assignment and hirer	To keep records of placements made or assignments arranged by us	Legal obligation (if applicable). Contractual obligation (if applicable). Legitimate interests.
Credit history	Suitability checks	Legal obligation (if applicable). Contractual obligation (if applicable). Legitimate interests.
Candidate/work-finding Agreement	To set out the basis of the relationship between you and us	Legal obligation (if applicable). Legitimate interests.
Sensitive personal data – criminal convictions	To check your suitability for certain roles or assignments	Legal obligation (if applicable). Contractual obligation (if applicable). Legitimate interests. Explicit consent or necessary for the performance of our employment or social security obligations

Bank details (temp only)	To pay you	Legal obligation (If applicable) Contractual performance.
Social security information, NI number (temp only)	To report to HMRC	Legal obligation (If applicable) Contractual performance.
Other necessary, relevant personal information	To perform our services for you	Contractual obligation (if applicable). Legitimate interests.

# **Direct Marketing**

We would like to use your contact details to contact you about job opportunities, news and information which we think may be of interest to you. However, we will not contact you with marketing material unless you consent to our doing so, and you have the right to unsubscribe at any time, by clicking the link which appears in the email footers of marketing emails.

## Sharing your personal data

Your personal information will be processed by our staff and will be provided to appropriate third parties such as potential hirers and intermediaries in order to provide you with work- finding services or to work-seekers in order to provide you with recruitment services. Please let us know if you do not want your personal information to be disclosed to a particular third party or category of third parties.

We may also share your personal details with your previous or current employers or other third parties identified by you to us as potential referees.

We may be required by law to share certain categories of your personal data with tax authorities and other government agencies. HMRC, NEST.

We may use a third-party organisation to check references, employment history and qualifications, undertake criminal record checks. We will need to provide them with certain categories of your personal data and they will be under an obligation to process it as instructed by us and in accordance with relevant data protection legislation. We may also need to provide certain categories of personal data to your pension provider, if appropriate.

We will not share your personal data with any other organisation unless it is necessary and in connection with providing our work-finding and recruitment services.

#### Where we store your personal data

All information stored on our recruitment software is secured through the Microsoft Azure Infrastructure and located at two data centres locations within Europe. Our primary centre is located in Microsoft's Western European centre, and these facilities are secured by a series of measures, including (but not limited to) biometric access, security alarm systems and round-the-clock security staff. Additional security information on Microsoft's data centres can be found <u>here.</u>

## How long we keep your data for

We retain different types of data for differing periods of time. The criteria we use to determine whether we should retain your personal data and how long for includes:

- The nature of the personal data
- Its perceived accuracy of your date
- Your engagement levels with our services
- Our legal obligations following an offer or when a placement has been made.

We may archive part or all of your personal data, or retain it on our financial systems but delete all or part of it from our recruitment software system. On removal, we may anonymise parts of your data – particularly following a request for suppression or deletion of your data – to ensure we do not re-enter your personal data to our database, unless you have requested us to do so.

Our current retention period for data on candidates who have not been place, or are no longer showing any signs of engagement with our website, is 2 years.

# Your rights

## The GDPR provides you with the following rights.:

- The right to be informed about the personal data we process on you
- The right of access to the personal data we process 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
- The right not to be subjected to automated decision-making and profiling.

## Changes to our privacy notice

Any changes we make to our privacy notice in future will be posted on this page and, where appropriate, you will be notified by e-mail. Please check back frequently to view any updates or changes to our privacy notice or for any further information please email **antonia@chamberslondon.co.uk** 

If for any reason you are dissatisfied with the way in which your personal data has been processed, you can complain to the appropriate supervisory authority for data protection:

## **United Kingdom**

Information Commissioner's Office (ICO)

Head office: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Phone Number: 0303 123 1113 or 55P

Website: <u>https://ico.org.uk/concerns/.ICO Website</u>

Your new rights under the GDPR are set out in this notice, and were last updated 1<sup>ST</sup> February 2022.