

## PRIVACY NOTICE

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Buckingham Recruitment Limited (of 68-69 St Martin's Lane, London, WC2N 4JS) are committed to protecting and respecting your privacy. This notice sets out the basis on which we will process personal data we collect from or about you.

Your rights under the General Data Protection Regulation (GDPR) are set out in this notice and apply from the 25<sup>th</sup> of May 2018.

Please read the following carefully regarding your personal data and how we will treat it.

**For the purposes of data protection legislation and related issues our nominated representative is Rebecca Dawkins, [rebecca@buckinghamrecruitment.co.uk](mailto:rebecca@buckinghamrecruitment.co.uk).**

### **Who we are and what we do:**

We are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003. We collect the personal data of the following types of people to allow us to undertake our business:

- Prospective and placed candidates for permanent or temporary roles.
- Prospective and live client contacts.
- Supplier contacts to support our services.
- Employees and temporary workers.

We collect information about you to carry out our core business and ancillary activities.

### **Information you give to us or we collect about you:**

This is information about you that you give us by applying for a role on our website [www.buckinghamrecruitment.co.uk](http://www.buckinghamrecruitment.co.uk) or to an advertisement placed by us on an external job board or by corresponding with us face to face, by telephone, email or otherwise.

The information we collect about you may include your name, address, private and corporate email address and phone number, curriculum vitae, photograph, financial information, NI number, passport copy, email correspondence, details about current / past employment and interview notes including employment preferences. It may also include compliance documentation and references and links to your profiles available in the public domain e.g. LinkedIn, Twitter, Facebook or corporate websites.

### **Information we collect about you when you visit our website:**

We use Google Analytics but we cannot identify individual information from the reports.

### **Purposes of the processing and the legal basis for the processing:**

We use information held about you in the following ways:

- The introduction of candidates to our clients for the purpose of potential temporary or permanent employment. Our service expands to supporting individuals throughout their career and to supporting businesses' resourcing needs and strategies. With this in mind, we have a community of contacts that we research and contact on a regular basis.
- To carry out our obligations to candidates on our payroll, arising from temporary contracts between you and Buckingham Recruitment.

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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' and 'legal obligation'.

We will rely on 'contract' if we have entered into a temporary placement contract with you to work for a third party whilst on our payroll.

We will rely on 'legal obligation' if we are legally required to hold information on to you to fulfil our legal obligations; for example, your passport or a visa to work in the UK.

## **Our Legitimate Business Interests:**

Our legitimate business interests in collecting and retaining your personal data are described below:

- As a recruitment agency and recruitment business we introduce candidates to clients for potential permanent employment or temporary worker placements. 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 requirements.
- To maintain, expand and develop our business we need to record the personal data of prospective candidates and client contacts.

## **Consent:**

Should we want or need to rely on consent to lawfully process your data we will request your consent 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 at any time.

## **Other uses we may make of your data:**

We may use this information for the following:

- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

We do use our computer systems to search and identify personal data in accordance with the information you have given us.

## **Cookies:**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

## **Disclosure of your information inside and outside of the EEA:**

We may share your personal information with selected third parties including:

- Clients for the purpose of introducing candidates.
- Candidates for the purpose of arranging interviews and temporary or permanent employment.
- Clients, business partners, suppliers and sub-contractors for the performance and compliance obligations of any contract we enter into with them or you.

We may disclose your personal information to third parties, including:

- In the event that we sell or buy any business or assets, in which case we would be likely to disclose your personal data to the prospective seller or buyer of such business or assets.
- If we or substantially all of our assets were acquired by a third party, in which case personal data held by it about its' customers could be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation or other agreements, or to protect the rights, property, or safety of ourselves, our customers or others.

The lawful basis for the third-party processing may include:

- Their own legitimate business interests in processing your personal data, in most cases to fulfil their internal resourcing needs.
- Satisfaction of their contractual obligations to us as our data processor, or payroll advisor/provider.
- For the purpose of a contract in place to work with us on recruitment or consultancy services.
- To fulfil their legal obligations.

### **Where we store and process your personal data:**

The data that we collect from you may be transferred to, and be stored at, a destination outside the European Economic Area ("EEA"). It may be transferred to third parties outside of the EEA for the purpose of our recruitment services. By submitting your personal data, you agree to this transfer, storing or processing. Buckingham Recruitment will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

The information you provide to us is stored on a cloud-based storage system, our accounting and banking systems, our database and our paper records.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### **Retention of your data:**

We will retain your personal data only for as long as is necessary. Different laws require us to keep different data for different periods of time.

We may keep your payroll, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated legislation, for example relating to the national minimum wage, social security and tax.

We are keen to ensure the data we have on you is current and accurate. To do this we do the following:

- Prior to making an introduction with a prospective employer, we check that we have current information about you.
- We keep in touch from time to time, so you can let us know of changes to your personal data among other matters.
- We welcome updates from all our contacts, including via email, telephone and in person.

### **Your rights:**

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend

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to disclose your information to any third party for such purposes and we will collect express consent from you if legally required prior to using your personal data for marketing purposes. You can exercise this right at any time by contacting us at [rebecca@buckinghamrecruitment.co.uk](mailto:rebecca@buckinghamrecruitment.co.uk).

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **The GDPR:**

The GDPR provides you with rights including the following:

- **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.
- **Make a complaint** to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: <https://ico.org.uk/concerns/>.

## **Access to information:**

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.

A subject access request should be submitted to [rebecca@buckinghamrecruitment.co.uk](mailto:rebecca@buckinghamrecruitment.co.uk).

## **Changes to our privacy notice:**

Any changes we make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy notice.

## **Contact:**

Questions, comments and requests regarding this privacy notice should be addressed to Rebecca Dawkins, [rebecca@buckinghamrecruitment.co.uk](mailto:rebecca@buckinghamrecruitment.co.uk).