

## CONSOL PARTNERS LIMITED PRIVACY NOTICE (when personal data is obtained from third party)

Company name:	ConSol Partners Limited ('the Company', 'we', 'us', 'our')
Contact details:	Margarita Ruiz, <a href="mailto:gdpr@consolpartners.com">gdpr@consolpartners.com</a> 02032077999
Document:	Privacy Notice (when personal data is obtained from third party)
Subject:	Data protection
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ConSol Partners Limited is a data controller for the purposes of the General Data Protection Regulation (**GDPR**) (Regulation (EU) 2016/679). We are responsible for ensuring that any processing of your personal information by us is done fairly and lawfully. Processing your personal data includes holding, obtaining, recording, using or sharing it. We take your privacy very seriously and will only process your personal data for the purposes set out in this notice.

The person responsible for data protection enquiries is Margarita Ruiz who can be contacted at [gdpr@consolpartners.com](mailto:gdpr@consolpartners.com) or 0203 207 7999

### Source of your personal data

We obtained the following categories of personal data:

- a) Your Contact Details
- b) Your CV and/or employment and education history
- c) Your approximate location

from job boards, such as Cambridge Wireless, Career Builder, ConSol Partners Website, CW Jobs, Cyber Security Jobsite, Electronics Weekly, Google, ICT Jobs Belgium, Indeed, JobServe, Jobsite, Monster, OpenWeb, Reed, TalentBin, Top Language Jobs and social media platforms, such as LinkedIn; Xing, viadeo, Facebook, Github, StackOverflow, Behance, Elance, about.me, Pinterest, Kaggle, weibo and G+

All of the above are publicly accessible sources

Details about the purposes for which your personal data may be processed and the basis processing your personal data, together with details of your rights in relation to the processing of your data can be found at <https://www.consolpartners.com/privacy-policy/>

### The purposes for which your personal data will be processed

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

### The Lawful basis for processing your personal data

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

- Contractual obligation
- Legal obligation
- Legitimate interest
- Consent

In certain circumstances we are required to process certain categories of personal data in order to comply with our legal obligations under relevant legislation, including the Conduct of Employment Agencies and Employment Businesses Regulations 2003 and other relevant tax, social security or other legislation. 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.

We also 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.

Where no contractual or legal obligation exists, we may still need to process your personal data in order to pursue our legitimate business interests. 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 will balance our legitimate interests against your rights and legitimate interests and expectations.

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.

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	
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.
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.

Information about your pay and conditions (temp only)	To protect your rights	Legal obligation (if applicable). Contractual obligation (if applicable). Legitimate interests.
Telephone call recordings	To improve quality, performance and staff training. To keep an accurate record of conversations. To establish or defend a legal claim.	Contractual performance (if applicable) Legitimate interests.
Other necessary, relevant personal information	To perform our services for you	Contractual obligation (if applicable). Legitimate interests.

### **Call Recording**

We may record telephone calls for training, quality and security purposes.

### **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.

### **Sensitive personal data**

We do not normally process special categories of data, also known as sensitive data. We will only ever process sensitive data when necessary to provide you with a safe place of work, or to comply with legal or industry-specific requirements. We will only process sensitive data with your express consent, unless the processing of your sensitive personal data is necessary for other reasons permitted by law. Please do not disclose any sensitive personal data about yourself to us unless we request it or it is essential to do so. Unsolicited personal data will be deleted.

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Where we collect or process any other categories of personal data (including sensitive personal data) about you that is not listed above, we will send you a separate Privacy Notice regarding the processing of such data by us.

### **Sharing your personal data**

Your personal information will be processed by our staff and our subcontractors (including IT providers) 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 HMRC or other relevant tax authorities, regulatory bodies or government agencies.

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.

## **Overseas transfers**

Data will be stored within the EEA on either local or cloud-based servers and will be subject to technical and organisation safeguarding protection measures. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

Some categories of data may be transferred outside the EEA if it is necessary to do so. We will take all reasonable steps to ensure that your data is subject to the same protection as that provided by the EU and that it is subject to technical and organisational safeguarding protection measures as follows:

We will only transfer your personal data to organisations located in countries outside the EEA, if the organisation:

- is based in a country which has been deemed to provide an adequate level of protection for personal data by the European Commission, or
- has entered into an agreement with us which contains specific contract clauses approved by the European Commission which give personal data the same protection that it has in Europe.

For further details, please see the following:

[\*European Commission: Adequacy of the protection of personal data in non-EU countries\*](#)

[\*European Commission: Model contracts for the transfer of personal data to third countries\*](#)

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **Accuracy of your data**

We will endeavour to keep your personal data accurate and up to date and will only process it for the specific purposes notified above. Data that is inaccurate or out of date will be deleted. Please notify us if your personal details change or if you become aware of any inaccuracies in the personal data we hold about you.

## **Retaining your data**

Different laws require us to keep different data for different periods of time. For example, we are required by the Conduct of Employment Agencies and Employment Businesses Regulations 2003 to keep work-seeker records for at least one year from the date of their creation or the date upon which we last provide a work-seeker with work-finding services.

We must also keep work-seekers' payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as legally required by tax authorities and relevant social security and tax legislation.

We may also retain your personal data in order to pursue our legitimate business interests. We will not store your data for any longer than is necessary to comply with our legal obligations or to pursue our legitimate business interests. We will delete your data in line with our retention policy.

## **Your rights**

Whilst we are processing your data, you have the right to:

1. request access personal data we hold about you;
2. object to the processing of your personal data;
3. ask to have inaccurate data held about you restricted or removed;
4. ask to have inaccurate data held about you corrected;
5. if processing of your personal data is based only on consent, to withdraw that consent;
6. request that your personal data is shared with a third party.

## **Data security**

We will ensure that appropriate measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data. We have in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction.

We will only transfer personal data to a third party if they agree to comply with those procedures and policies, or put in place adequate measures prior to receiving it. Maintaining data security means guaranteeing the confidentiality, integrity and availability (for authorised purposes) of the personal data.

## **Further information and breach reporting**

If you require any information about the way in which we process your data or if you wish to report a complaint or a data breach, please contact Margarita Ruiz [gdpr@consolpartners.com](mailto:gdpr@consolpartners.com) 02032077999 or Alan Pett [alan.pett@consolpartners.com](mailto:alan.pett@consolpartners.com) as soon as possible. All enquiries will be responded to as quickly as possible and all data breaches will be taken very seriously. 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

Scotland office: 45 Melville Street, Edinburgh EH3 7HL

Wales office: 2nd floor, Churchill House, Churchill way, Cardiff CF10 2HH

Northern Ireland office: 3rd Floor, 14 Cromac Place, Belfast BT7 2JB

Phone Number: 0303 123 1113 or

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

### **USA**

Name: Federal Trade Commission (FTC)

Website: <https://www.ftc.gov/>

Web form: <https://www.ftccomplaintassistant.gov/>

Phone Number: (202) 326-2222

Address: Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580