

1. INTRODUCTION

- 1.1. Welcome to the privacy notice of Greaves Recruitment Solutions Limited (“GRS”).
- 1.2. GRS respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.
- 1.3. You can download a pdf version of the policy here [LINK].

2. PURPOSE OF THIS PRIVACY NOTICE

- 2.1. This privacy notice aims to give you information on how GRS collects and processes your personal data during and after our relationship with you.
- 2.2. It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.
- 2.3. This notice applies to all candidates, clients, suppliers and service providers to GRS.
- 2.4. We may update or amend this notice from time to time. We will notify you of any substantive amendments.

3. CONTROLLER

- 3.1. GRS is the data controller and responsible for your personal data. This means that it GRS decides how we hold and use personal information about you and for explaining this clearly to you.
- 3.2. We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.
- 3.3. The DPO is Lee Greaves, Director of GRS. Should you wish to contact Lee you can email him at lee@greavesrecruitment.co.uk or telephone him on 07967 751 258. GRS’ postal address is G11, Building 44, Europa Business Park, Bird Hall Lane, Cheadle, SK3 0XA.

4. YOUR DUTY TO INFORM US OF CHANGES

- 4.1. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

5. THE DATA WE COLLECT ABOUT YOU

- 5.1. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been

removed (anonymous data).

5.2. There are special categories of more sensitive personal data which require a higher level of protection. How we deal with this special data is also set out below.

5.3. For candidates, we may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

5.3.1. **Identity Data** includes title, first name, maiden name, last name, username or similar identifier, marital status, title, date and place of birth and gender. This also includes your current position, salary, benefits package and notice period as well as your references and any other information contained in your CV or covering letter/email.

5.3.2. **Contact Data** includes home, billing, work and email addresses and telephone numbers (both mobile and landline).

5.3.3. **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

5.3.4. **Usage Data** includes information about how you use our website and services.

5.3.5. **Marketing and Communications Data** includes your preferences in receiving marketing from us.

5.4. **Sensitive Personal Data** includes information about health, disability, nationality (including your right to work in the UK and any dual nationality) and unspent criminal convictions (including whether you have a full driving licence and if so, whether this is endorsed with any penalty points). We collect Sensitive Personal Data for the following reasons:-

5.4.1. We use information about your physical or mental health, or disability status to assess your fitness to work and to assist employers in managing health, safety and wellbeing in the workplace. This also allows us to seek reasonable adjustments on your behalf, e.g. in attending interviews.

5.4.2. We use information about any spent or unspent criminal convictions and offences to assess your suitability for certain positions. Please note that this may affect our decision to put you forward for a position with a client.

5.5. For clients, suppliers and service providers we will collect, use and store the following categories of information:-

5.5.1. **Identity Data** including your name, title and job title.

5.5.2. **Contact Data** including business contact information including telephone numbers, email addresses and postal addresses.

5.5.3. **Transaction Data** includes details about payments from you and other details of recruitment services you have purchased from GRS. We will also perform credit checks on companies, including checks on the directors, shareholders and verification of the

company registration number.

5.5.4.**Usage Data** includes information about how you use our website and services.

5.5.5.**Marketing and Communications Data** includes your preferences in receiving marketing from us.

6. HOW IS YOUR PERSONAL DATA COLLECTED?

6.1. We use different methods to collect data from and about you including through:

6.1.1.**Direct interactions.** You may give us your Identity, Contact and Financial Data by:-

- instructing us to complete a recruitment assignment;
- registering with us as a client or candidate;
- applying for a vacancy;
- contacting us.

These direct interactions may take place in person, over the telephone, by email, by text message or online by entering information into submission forms on our website.

6.1.2.**Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

- Search information providers
- Online job boards
- Referrals from other recruitment agencies or head hunters
- Referrals from industry contacts and information from former employers
- LinkedIn, Twitter, Facebook and other publically available social media platforms
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.

7. HOW WE USE YOUR PERSONAL DATA

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

7.1.1.For candidates: we do this to:-

- provide recruitment services to you, i.e. to assist you in seeking new professional opportunities;
- contact you to provide support in relation to your work;
- manage our relationship with you;
- check you are legally entitled to work in the UK; and
- ascertain your fitness to work.

7.1.2.For clients: where we need to perform the recruitment contract we are about to enter into or have entered into with you.

7.1.3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

7.1.4. Where we need to comply with a legal or regulatory obligation.

7.2. Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

8. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

8.1. We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

8.2. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new client or candidate	(a) Identity (b) Contact (c) Sensitive Personal Information	Performance of a contract with you and/or to provide our recruitment services to you
To complete the recruitment process including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you of vacancies that we believe will be of interest to you	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to

<p>(b) Notifying you about changes to our terms or privacy policy</p> <p>(c) Asking you for feedback on our service</p>	<p>(d) Marketing and Communications</p>	<p>keep our records updated and to study how clients and candidates use our services)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests (to study how clients and candidates use our services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, services, marketing, client and candidate relationships and experiences</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests (to define types of clients for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>

8.3. Some of these grounds will overlap and there may be several grounds which justify our use of this information.

9. SHARING YOUR INFORMATION

9.1. Unless this would be unfair to you, we have a legitimate interest in the smooth running of our business and in promoting and growing it. To do this we will share your personal information with our clients as prospective employers and any other potential employers that you have agreed we may contact on your behalf.

9.2. We will never approach an employer or share your personal information with a third party

without first obtaining your consent to do so.

10. FAILURE TO SUPPLY INFORMATION

10.1. If you do not supply the personal information of the types set out in this notice, we may be unable to assist you with the recruitment process and may not be able to fulfil our contract with you (or may be detrimentally impacted in doing so). If this is the case, we will tell you.

11. MARKETING

11.1. We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

12. OPTING OUT

12.1. You can ask us to stop sending you marketing messages at any time by contacting us.

12.2. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of the use of our service.

13. CHANGE OF PURPOSE

13.1. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

13.2. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

13.3. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

14. DATA SECURITY

14.1. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

14.2. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

14.3. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

15. DATA RETENTION

15.1. We will retain your personal data for a period of 10 years. This is to allow us to

consider you for future opportunities.

15.2. In some circumstances you can ask us to delete your data.

15.3. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

16. YOUR LEGAL RIGHTS

16.1. You have the right to be informed about what we are doing with your personal information. This includes the right to:-

- request access to your personal data;
- request correction of your personal data;
- request erasure of your personal data (although please note we cannot continue to provide our services to you if this happens);
- object to processing of your personal data;
- request restriction of processing your personal data;
- request transfer of your personal data;
- right to withdraw consent.

16.2. You have the right to ask us to restrict how we use your personal information for a period of time if you believe it to be inaccurate, and we want to verify the position, or if our processing is unlawful but you do not want us to erase your personal information, or for some other limited circumstances. This enables you to ask us to suspend the processing of personal information about you. If you ask us to do this, we may not be able to provide you with our services.

16.3. If you wish to exercise any of the rights set out above, please contact us.

17. WHAT WE MAY NEED FROM YOU

17.1. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

18. TIME LIMIT TO RESPOND

18.1. We try to respond to all legitimate requests within one month. Occasionally 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.

19. COMPLAINTS

19.1. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

