

# Privacy Notice

<b>Company Name:</b>	Reflect Recruitment Group Ltd (The Company)
<b>Company Contacts:</b>	Cameron Ford (Managing Director) Paul Squires (Training & Compliance Manager)
<b>Contact Details:</b>	3-5 London Road, Newark NG24 1TN <a href="mailto:gdpr@rrgroup.co.uk">gdpr@rrgroup.co.uk</a> or 01636 700373
<b>Topic:</b>	Data Protection

The Company is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process personal data (including sensitive personal data) so that it can provide these services – in doing so, the Company acts as a data controller.

You may give your personal details to the Company directly, such as on an application or registration form or via our website or email, or we may collect them from another source such as a jobs board. The Company must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to roles relevant to you we will only use your personal data in accordance with the terms of the following statement.

## COLLECTION AND USE OF PERSONAL DATA

### Purpose of processing and legal basis

The Company will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with work-finding services. This includes for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities, arranging payments to you and developing and managing our services and relationship with you and our clients.

In some cases we may be required to use your data for the purpose of investigating, reporting and detecting crime and also to comply with laws that apply to us. We may also use your information during the course of internal audits to demonstrate our compliance with certain industry standards.

The principal legal bases we rely upon to offer these services to you is Legitimate Interest although in some situations we may also rely on:

- Your consent
- To comply with a legal obligation that we have
- To fulfil a contractual obligation that we have with you.

### Legitimate interest

As mentioned, the principal legal basis that we rely upon to process your data is Legitimate Interest. This is where the Company has a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect from us. Where the Company has relied on a legitimate interest to process your personal data our legitimate interests which are likely to also be in your interests as a work seeker are as follows:

- For the purpose of providing work-seekers with work finding services
- To deliver recruitment services to our client customers
- To be able to contact you by email, telephone or text message to discuss suitable opportunities or to keep you informed
- To process payment for your work should you work as a temporary worker under a contract for Services with the Company
- To comply with legal and statutory obligations
- To deduct Tax and National Insurance as legally required
- To maintain our records and accounts.

#### **Recipient/s of data**

The Company will process your personal data and/or sensitive personal data with the following recipients:

- Companies (Clients) who we are assisting with their recruitment requirements
- Our software providers of our database on which we hold your data
- Our IT providers who manage the IT support and backup of our data
- If you are working on a temporary assignment through us, our accounts software provider, SAGE and our pension providers
- Your appointed Next of Kin contact, which is provided by you to us if you begin a temporary assignment through us, in the case of an emergency
- Your previous or potential new employers in connection with references
  - Where potential new employers of yours request a reference, we will only share personal information about you after we are satisfied that you have given your consent to do so
- Another recruitment company in the rare instance that we are in a supply chain and acting as a second-tier recruitment supplier
- The Administrators of any recruitment or staff on-boarding portals that our clients may request us to use in order to (including but not limited to) assess candidate suitability, arrange interviews/assessments, on-board new starters and process timesheet entries
- Our Advisors such as Accountants, Legal Advisors, Insurers or Banks.
- The Disclosure and Barring Service where required
- Our partners who assist us in providing recruitment services, such as:

- The Administrator of our Secured Document Signing portal to allow us to collect your data for the purposes of Administering your Contract for Services and your payroll (if you are working through us on a temporary assignment) and this data is encrypted.
- The Administrator of our customer review/recommendation service, Feefo
- The Administrator of our Home Office approved Right to Work checking portal, Digidentity.
- Government, law enforcement agencies and other regulators such as the Police, Home Office, HM Revenue & Customs (HMRC), the Department for Work & Pensions (DWP), Employment Agencies Standards Inspectorate (EASI), Local Authority Designated Officers (LADO's), the Gangmasters and Labour Abuse Authority (GLAA) and their auditors.

### **Self-Clarification or Rectification of Your Data**

There may be occasions where You wish to clarify or rectify the personal information which the Company holds about You, for example to amend your contact information, clarify your previous employment history, gain access to any documentation that we hold on-file about You, or to exercise your right to a Subject Access Request (SAR).

In these scenarios, we follow a verification process which our Employees will follow to assure themselves that You are truly the rightful recipient of that data.

If you contact us by telephone to clarify or rectify your personal information, or to undertake a SAR, we will only release information after a successful verification as follows:

You contact the Company via telephone	You contact the Company by email	You contact the Company via letter
1. We will ask for your full name	1. You must supply us with your full name	1. You must supply us with your full name
2. Our telephone system will check if the phone number you are calling from matches our database records under your name (1 <sup>st</sup> step verification)	2. We will check that the email address used matches the one we have on record for you (1 <sup>st</sup> step verification)	
<b>If we cannot verify your identity:</b>		
3. We will ask you to confirm two pieces of personal information, to include two of the following: <ul style="list-style-type: none"><li>• Date of Birth</li><li>• National Insurance Number</li><li>• Last known address</li></ul> (2 <sup>nd</sup> step verification)		2. We will ask you to confirm two pieces of personal information, to include two of the following: <ul style="list-style-type: none"><li>• Date of Birth</li><li>• National Insurance Number</li><li>• Last known address</li></ul>

**Statutory/contractual requirement**

Your personal data is required by law and/or a contractual requirement (e.g. our client may require this personal data), and/or a requirement necessary to enter into a contract. Recruitment Agencies must collect certain personal data to meet statutory obligations such as the Conduct of Employment Agencies and Employment Business Regulations 2003. You are obliged to provide the personal data and if you do not, as a result we would be unable to work on your behalf.

**Overseas Transfers**

The Company will not transfer the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with work-finding services. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

**Data retention**

The Company will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time.

The Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services.

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

Where the Company has obtained your consent to process your sensitive personal data such as criminal record details, we will do so in line with our retention policy, i.e. for seven years at year end from last contact or employment. Upon expiry of that period the Company may seek further consent from you. Where consent is not granted the Company will cease to process your sensitive personal data.

**Your rights**

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes 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 that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to the Company processing your sensitive personal data, you have the right to withdraw that consent at any time by contacting Cameron Ford or Paul Squires via the contact details above who handle data protection issues.

There may be circumstances where the Company will still need to process your data for legal or official reasons. We will inform you if this is the case. Where this is the case, we

will restrict the data to only what is necessary for the purpose of meeting those specific reasons.

If you believe that any of your data that the Company processes is incorrect or incomplete, please contact us using the details above and we will take reasonable steps to check its accuracy and correct it where necessary.

You can also contact us using the above details if you would like us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.

#### **Automated decision-making**

Your personal data will be held on our database system. As such, we operate searches of data within that to identify suitable candidates for specific roles. Although that short listing is done by the database, the criteria for the short listing are defined by a member of staff of the Company which does not constitute Automated decision making as defined by the General Data Protection Regulations.

#### **Complaints or queries**

If you wish to complain about this privacy notice or any of the procedures set out in it please contact Cameron Ford, Director or Paul Squires, Training & Compliance Manager, either of whom will be happy to assist. You can reach both by emailing [gdpr@rrgroup.co.uk](mailto:gdpr@rrgroup.co.uk) or by calling 01636 700373.

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.