

Company Name:	Langley James Limited ('the Company')
Company Contact details:	James Toovey is the data protection lead in the Company and his email address is jt@langleyjames.com
Document DP5	Privacy Notice (including for use of the company website)
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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 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 this privacy statement. At all times we will comply with current data protection laws.

Contents

1. Collection and use of personal data
 - a. Purpose of processing and legal basis
 - b. Legitimate interest
 - c. Statutory/contractual requirement
 - d. Recipients of data
2. Information to be provided when data is not collected directly from the data subject
 - a. Categories of data
 - b. Sources of data
3. Overseas transfers
4. Data retention
5. Your rights
6. Automated decision making
7. Cookies
8. Login files
9. Links to external sites
10. Sale of the business
11. Data security
12. Changes to this privacy statement
13. Complaints or queries

1. Collection and use of personal data

a. 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.

If you have opted-in we may also send you marketing information and news via email/ text. You can opt-out from receiving these at any time by clicking "unsubscribe" when you receive these communications from us.

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.

We must have a legal basis to process your personal data. The legal bases we rely upon to offer our work-finding services to you are:

- Your consent
- Where we have a legitimate interest
- To comply with a legal obligation that we have
- To fulfil a contractual obligation that we have with you

b. 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 is/are as follows:

- Managing our database and keeping work-seeker records up to date;
- Providing work-finding services to you and our clients;
- Contacting you to seek your consent where we need it;
- Giving you information about similar products or services that you have used from us recently;

c. Statutory/contractual requirement

The Company has certain legal and contractual requirements to collect personal data (e.g. to comply with the Conduct of Employment Agencies and Employment Businesses Regulations 2003, immigration and tax legislation, and in some circumstances safeguarding requirements.) Our clients may also require this personal data, and/or we may need your data to enter into a contract with you. If you do not give us personal data we need to collect we may not be able to continue to provide work-finding services to you.

d. Recipient/s of data

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

- With prospective client companies that employ either as permanent staff or sub contractors IT Personnel
- Former or prospective new employers to obtain or provide references to
- The Recruitment and Employment Confederation, APSCo, CIPD of which we are members
- Any other third parties who carry out audits to ensure that we run our business correctly
- Payroll service providers who manage our payroll on our behalf
- Umbrella companies that we may pass candidate data to

- Other recruitment agencies in the supply chain (e.g. master/neutral vendors and second tier suppliers);
- Our insurers
- Our legal advisers
- Social networks
- Your IT and CRM providers
- Any public information sources and third party organisations that we may use to carry out suitability checks on work-seekers e.g. Companies House, the Disclosure and Barring Service (DBS), National College for Teaching and Leadership (NCTL), Nursing and Midwifery Council (NMC), General Medical Council (GMC), DVLA, credit reference agencies
- Government law enforcement agencies and other regulators e.g the Police, Home Office, HMRC, Employment Agencies Standards Inspectorate (EASI), Local Authority Designated Officers (LADOs), GLAA,
- Trade unions;

2. Information to be provided when data collected not from the data subject

Categories of data: The Company has collected the following personal data on you:

Personal data:

- Name, address, mobile no., email
- National insurance no.
- Nationality (through right to work check)

Source of the personal data: The Company sourced your personal data/sensitive personal data:

- From either CW Jobs, CV Library, Indeed, Jobserve, Jobsite, Reed, Monster, TotalJobs and any of their subsidiary boards jobs boards, Stack Overflow, LinkedIn or Facebook
- A former employer
- A referee whose details you previously provided to us
- Software providers who we use to support our services

This information did not come from a publicly accessible source.

3. Overseas Transfers [Optional]

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.

4. 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. For example, 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. This is currently 3 to 6 years.

Where the Company has obtained your consent to process your personal data/sensitive personal data, such as contact details including but not limited to home address, personal email address, mobile and landline

telephone number, date of birth, gender, National Insurance Number, Passport Number and Bank Details, we will do so in line with our retention policy (a copy of which can be found on our website under retention policy). Upon expiry of that period the Company will seek further consent from you. Where consent is not granted the Company will cease to process your personal data.

5. 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 personal data/sensitive personal data you have the right to withdraw that consent at any time by contacting James Toovey, Managing Director who can be reached by emailing jt@langleyjames.com who within our organisation handles data protection issues and, where applicable, any representative of the controller and the data protection officer.

Please note that if you withdraw your consent to further processing that does not affect any processing done prior to the withdrawal of that consent, or which is done according to another legal basis.

There may be circumstances where the Company will still need to process your data for legal or official reasons. Where this is the case, we will tell you and we will restrict the data to only what is necessary for 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 want 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.

6. Cookies

We may obtain data about you from cookies. These are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies also enable us to deliver more personalised content.

The table below explains the cookies we use and why.

Cookie	Name	Purpose	More information
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IDE	GCLID	Google Adwords & Analytic	GCLID is used to track & pass data between Google Adwords & Analytics and is also responsible for identifying a user who has clicked on your ad from a use who has come directly to your website.
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Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, please refer to our Cookie policy. Please note that in a few cases some of our website features may not function if you remove cookies from your browser.

7. Log Files

We use IP addresses to analyse trends, administer the site, track users' movements, and to gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

8. Links to external websites

The Company's website may contain links to other external websites. Please be aware that the Company is not responsible for the privacy practices of such other sites. When you leave our site we encourage you to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by the Company's website.

9. Sale of business

If the Company's business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

10. Data Security

The Company takes every precaution to protect our users' information. Examples of which are detailed below

- Virus Software and Firewalls
- Browser certification technology,
- Encryption,
- Limited access to authorised personnel only
- Passwords protection on all PC's< Laptops and Mobile devices appropriate.

Only employees who need the information to perform a specific job (for example, consultants, our accounts clerk or a marketing assistant) are granted access to your information.

The Company uses all reasonable efforts to safeguard your personal information. However, you should be aware that the use of email/ the Internet is not entirely secure and for this reason the Company cannot guarantee the security or integrity of any personal information which is transferred from you or to you via email/ the Internet.

If you share a device with others we recommend that you do not select the "remember my details" function when that option is offered.

If you have any questions about the security at our website, you can email James Toovey and his email address is jt@langleyjames.com.

11. Changes to this privacy statement

We will update this privacy statement from time to time. We will post any changes on the statement with revision dates. If we make any material changes, we will notify you.

12. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: **James Toovey and his email address is jt@langleyjames.com.**

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.

Annex A

a) The lawfulness of processing conditions for personal data are:

1. Consent of the individual for one or more specific purposes.
2. Processing is necessary for the performance of a contract with the individual or in order to take steps at the request of the individual to enter into a contract.
3. Processing is necessary for compliance with a legal obligation that the controller is subject to.
4. Processing is necessary to protect the vital interests of the individual or another person.
5. Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller.
6. Processing is necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the individual which require protection of personal data, in particular where the individual is a child.

b) The lawfulness of processing conditions for sensitive personal data are:

1. Explicit consent of the individual for one or more specified purposes, unless reliance on consent is prohibited by EU or Member State law.
2. Processing is necessary for carrying out data controller's obligations under employment, social security or social protection law, or a collective agreement, providing for appropriate safeguards for the fundamental rights and interests of the individual.
3. Processing is necessary to protect the vital interests of the individual or another individual where the individual is physically or legally incapable of giving consent.
4. In the course of its legitimate activities, processing is carried out with appropriate safeguards by a foundation, association or any other not-for-profit body, with a political, philosophical, religious or trade union aim and on condition that the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes) and provided there is no disclosure to a third party without the consent of the individual.
5. Processing relates to personal data which are manifestly made public by the individual.
6. Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.
7. Processing is necessary for reasons of substantial public interest on the basis of EU or Member State law which shall be proportionate to the aim pursued, respects the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and interests of the individual.
8. Processing is necessary for the purposes of preventative or occupational medicine, for assessing the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of EU or Member State law or a contract with a health professional and subject to the necessary conditions and safeguards.
9. Processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of healthcare and of medicinal products or medical devices, on the basis of EU or Member State law

which provides for suitable and specific measures to safeguard the rights and freedoms of the individual, in particular professional secrecy.

10. Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard fundamental rights and interests of the individual.