

BACKGROUND:

<<Insert company name>> recruitment business which provides work-finding services to its customers. The Company must process personal data [(including sensitive personal data)] so that it can provide these services. In so doing, the Company acts as a data controller.

You may give your personal data to the Company directly, such as on an application or registration form, or we may collect them from another source, such as a recruitment agency. The Company must have a legal basis for processing your personal data. For more details, see the section on processing your personal data in accordance with the law. We will only use your personal data in accordance with the law relating to providing you with work-finding services.

1. Information About Us

<<insert company name>>

A limited company registered in England with company number <<insert company number>>.

Registered address: <<insert company address>>

Main trading address: <<insert company address>>

VAT number: <<insert VAT number>>

[Data Protection Officer: <<insert name>>]

Email address: <<insert email address>>

Telephone number: <<insert telephone number>>

Postal address: <<insert postal address>>

[Representative: <<insert name>>]

Email address: <<insert email address>>

Telephone number: <<insert telephone number>>

Postal address: <<insert postal address>>

[We are regulated by <<insert name of regulator>>.]

[We are a member of <<insert name of association>>.]

[<<insert further information>>.]

2. What Does This Notice Cover?

This Privacy Notice explains what personal data we collect, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What Is Personal Data?

Personal data is defined in the Data Protection Act 2018 (collectively, "the Data Protection Act") as "any information relating to an identifiable person who can be identified in particular by reference to that information".

to an identifier’.

Personal data is, in simple terms, any information that identifies you. This includes identifying information such as your name and contact details, but it also covers information such as identification numbers, electronic location data, and

The personal data that we

about you that enables you to be identified, such as your name and contact details, such as identification numbers,

below.

4. What Are My Rights?

Under the Data Protection Act 1998, you have the following rights, which we will always work to uphold:

- a) The right to be informed. This Privacy Notice tells you what we do with your personal data. You always contact us to exercise your rights. See Part 11.
- b) The right to access your personal data. We will tell you how to do this.
- c) The right to have your personal data corrected if it is inaccurate. See Part 11 to find out more.
- d) The right to be forgotten. If you want us to delete or otherwise dispose of any of your personal data, please contact us using the details in Part 11 to find out more.
- e) The right to restrict the processing of your personal data.
- f) The right to object to the processing of your personal data for a particular purpose or purposes.
- g) The right to withdraw your consent as the legal basis for processing your personal data. If you have provided personal data to us directly, you can ask us for a copy of the data we hold about you in many cases.
- i) Rights relating to automated decision-making and profiling. [We do not use automated decision-making or profiling. [We do not use automated decision-making or profiling]].

For more information about your rights, please contact us.

It is important that your personal data we hold about you is accurate and up-to-date. If any of the information we hold about you is incorrect, please keep us informed as long as we have that data.

Further information about your rights can be obtained from the Information Commissioner’s Office or your local Data Protection Officer.

If you have any cause for concern about the way we handle your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office. We would

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welcome the opportunity to contact us first, using the details

ourselves, however, so please

5. What Personal Data Do You

The Company may collect special category or ‘sensitive

the following personal data [and

Data Collected
[Identity Information including <<insert data collected, e.g. name, title, date of birth, gender>>.]
[Contact information including <<insert data collected, e.g. address, email address, telephone number>>.]
[Work information including <<insert data collected, e.g. CV>>.]
[Other identity information including <<insert data collected, e.g. National Insurance number, nationality (for evidence of work)>>.]
[Sensitive personal information including <<insert data collected, e.g. health information>>.]
[<<add further information as required>>.]

Collect the Data
Method of collection and/or
Method of collection and/or
Method of collection and/or
Method of collection and/or
Method of collection and/or

You are under no obligation to provide certain information

with data. However, if you do not provide work-finding services.

6. How Do You Use My Personal

The Company needs to provide services to you.

The Company will process your data for the purposes of providing you with work-finding services. This includes, for example, contacting you about job opportunities, assessing your suitability, updating our databases, putting you forward for interviews, and developing and managing our relationship with you and our clients.

In some cases, the Company may process your data for the purpose of investigating, reporting on, and responding to any issues that apply to us. We may also process your data for internal audits to demonstrate our compliance with applicable laws and standards.

[We use the following automated decision-making] AND/OR [profiling] on the basis of this or wish to take the action themselves, rather than the automated method. The Data Protection Legislation gives you the right to object to this.

data in order to offer work-finding

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working out certain kinds of [decision-making] to query any action that we take or wish to take (i.e. have someone review the automated method), the Data Protection Legislation gives you the right to object to this. Please contact us to find out more

using the details in Part 11.

- [The following automated decision-making method(s) may be used:
 - <<insert simple explanation of the automated decision-making including the legal basis on which you rely, the data used, the reason(s) for using that data, and the intended effects>>.
 - <<add further details>>.]
- [The following automated decision-making method(s) may be used:
 - <<insert simple explanation of the automated decision-making including the legal basis on which you rely, the data used, the reason(s) for using that data, and the intended effects>>.
 - <<add further details>>.]

The legal bases we rely upon are:

- Your consent (e.g. to contact you about a new candidate or to manage our relationship with you).
- Where we have a legitimate interest in managing our database and keeping our services to you and our clients, where it is needed);
- To comply with a legal requirement (e.g. in order to check your entitlement to a benefit or to comply with safeguarding requirements]).

The Company will only use your personal data for the purposes for which it was originally collected, unless it is compatible with those original purposes. If we do use your personal data for a purpose that is incompatible with the original purpose, we will inform you and explain the legal basis for this.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose for which it was originally collected, we will inform you and explain the legal basis for this.

In some circumstances, we may process your personal data without your consent, where this is required by law. This will only be done within the bounds of the Data Protection Act 1998.

7. How Long Will You Keep My Data?

The Company will only hold your personal data for as long as is necessary to fulfil the purposes for which we collect it.

Different laws may also require us to keep your data for different periods of time.

The Conduct of Employment Agencies and Employment Businesses Regulations 2003 require us to keep your data for at least one year from:

- the date of their creation;
- after the date on which you cease to be employed by us.

[The Company must also keep your personal data for as long as is required by HMRC and as required by pension auto-enrolment legislation].

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automated decision-making including the legal basis on which you rely, the data used, the reason(s) for using that data, and the intended effects>>.

>>.]

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>>.]

to you are:

new candidate or to manage our relationship with you).

managing our database and keeping our services to you and our clients, where it is needed);

subject to (e.g. in order to check your entitlement to a benefit or to comply with safeguarding requirements]).

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with work-finding services.

ords, holiday pay, sick pay, and other benefits. We will retain your data for as long as is legally required by HMRC, minimum wage, social security, and tax legislation].

Where the Company has sensitive data, we will do so for a limited period to which you have consented. Where consent is not granted, we will not process your data.

to process your personal and sensitive data. Upon expiry of the period to which you have consented, we will seek further consent from you. Where consent is not granted, we will not process your data.

8. How and Where Do You Store Personal Data?

Personal Data?

Data is stored in a range of systems, including the Company's candidate database, the Company's email systems, and other IT systems (including cloud storage).

including on your application record, [in the Company's candidate database, the Company's email systems, and other IT systems (including cloud storage)].

[We will [only store your personal data] in the UK. This means that it will be fully protected under the Data Protection Legislation.]

some of your personal data] in the UK. This means that it will be fully protected under the Data Protection Legislation.]

AND/OR

[We will [only store your personal data] within the European Economic Area (EEA) consists of all EU member states, plus Norway, Iceland, and Switzerland. This means that your personal data will be fully protected under the Data Protection Legislation. Transfers of personal data to countries outside of the UK are permitted without additional safeguards.]

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AND/OR

[We [may] store some or all of your personal data in countries outside of the UK. These are known as "third countries". We will ensure that your personal data is transferred to and stored in these countries under the Data Protection Legislation.]

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[We ensure that your personal data is transferred to and stored in these countries under binding corporate rules. Binding corporate rules are a set of internal rules which all our group companies are required to follow when processing personal data. For further information, please refer to the [Information Commissioner's Office](#).]

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OR

[We will only store or transfer your personal data to countries that are deemed to provide an adequate level of data protection. For further information about adequacy decisions, please refer to the [Information Commissioner's Office](#).]

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OR

[We will use specific approved data protection mechanisms to ensure the same levels of personal data protection that apply in the UK. For further information, please refer to the [Information Commissioner's Office](#).]

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Please contact us using the contact details below for further information about the particular data protection issues when transferring your personal data to a third country.]

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The security of your personal data is important to us. To ensure a number of important measures are taken to protect your data, we take the following steps:

, and to protect your data, we take the following steps:

- limiting access to your personal data to those employees, contractors, and other third parties who have a legitimate need to know and maintain confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful disclosure of, or access to, your personal data) including reporting to the Information Commissioner's Office.

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nes (the accidental or unlawful disclosure of, or access to, your personal data) including reporting to the Information Commissioner's Office.

Office where we are based; and

- <<describe specific

9. Do You Share My Personal Data?

The Company will process your personal data, including sensitive personal data with the following recipients:

- HMRC;
- Clients of the Company;
- Any applicable legal advisers;
- Previous employers (where necessary);
- [Payroll service provider];
- [<<Add additional third parties if applicable>>].

When your personal data is shared with a third party, as described above, we will take steps to ensure that it is handled safely, securely, and in accordance with your rights and the third party's obligations under the law, as described above.

[If any personal data is transferred outside the UK, we will take suitable steps in order to ensure that your data is handled just as safely and securely as it would be within the UK and in accordance with the Data Protection Legislation, as explained above in Part 8.]

10. How Can I Access My Personal Data?

If you want to know what personal data we hold about you, you can ask us for details of that personal data and for access to it. This is known as a "subject access request".

All subject access requests should be made to the email or postal addresses shown in Part 8. We will respond to you as quickly as possible and send you a copy of your personal data within the time limit. You do not have to use this form, but it is the easiest way to make a request as quickly as possible. You need to know to respond to your request.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover the cost of responding.

We will respond to your subject access request within [insert period (less than one month)]>> and, in any case, we will aim to provide a complete copy of your personal data within that time. In some cases, however, more time may be required up to one month from the date we receive your request. You will be kept informed of progress.

11. How Do I Contact You?

To contact us about any aspect of your personal data and data protection, including to make a subject access request, please use the following details [(for the attention of <<insert name>>)]:

Email address: <<insert email address>>

Telephone number: <<insert telephone number>>.

Postal Address: <<insert postal address>>.

12. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website <<insert website address>> where/how>>. This Privacy Notice was last updated on <<insert date>>.

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