



Privacy Notice May 2018

Delaney Browne (Reading) Ltd ('the Company') trading as Delaney Browne Appointments. Company contact Mike Setterfield, mike@delaneybrowne.co.uk 01628825242.

The Company is a recruitment business and a recruitment agency, as defined in the Employment Agencies and Employment Businesses Regulations 2003, 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. The company collects personal data from prospective and live candidates, clients, suppliers and employees.

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 the terms of the following statement.

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. The legal basis we rely upon to offer these services to you are:

- Legitimate interest
- Consent
- Legal obligation
- Contractual obligation

b. Legitimate Interest

The company provides work finding services to its clients and candidates, a core element of this service is the exchange of personal data with candidates and clients. This exchange is necessary to support the work seeking aims of candidates and the resourcing requirements of clients.

c. Categories of data

The personal data collected by the Company may include name/contact details, education details, employment history, nationality, immigration status – whether you need a work permit, ID such as copy of passport or drivers licence, financial information, referee details and emergency contact details.

d. Recipient/s of data

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

- Potential employers in support of your interest in finding employment
- Potential employees in support of your interest in sourcing staff
- Payroll bureau for the purpose of paying you
- Pension provider for the purpose of enrolling you as appropriate
- HMRC for tax/NI reporting obligations

e. 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. You are obliged to provide the personal data and if you do not the consequences of failure to provide the data are:

- We will not be able to continue to support the application for which the data is required.

2. Overseas Transfers

The Company may transfer only the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with work-finding services. We will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

3. Data retention

The Company will retain your personal data only for as long as is necessary. Different laws 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 personal and sensitive personal data we will do so in line with our retention policy (a copy of which is available on request). 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 and sensitive personal data.

4. 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/and sensitive personal data you have the right to withdraw that consent at any time by contacting Mike Setterfield by e-mail mike@delaneybrowne.co.uk or phone 01628825242 or in writing at Delaney Browne, 400 Thames Valley Park Drive, Reading, Berks, RG6 1PT.

5. Source of the personal data

The Company sourced your personal data/sensitive personal data by the following means:

- You may have supplied the information directly to us in support of a work seeking application.
- You may have responded to a role advertised by us on a third party job site e.g. www.reed.co.uk.
- We may obtain information about you from searching for potential candidates from third party sources, such as LinkedIn and other job sites.
- This information did not come from a publicly accessible source

6. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: Mike Setterfield by e-mail mike@delaneybrowne.co.uk or phone 01628825242 or in writing at Delaney Browne, 400 Thames Valley Park Drive, Reading, Berks, RG6 1PT.

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.