

E3 Recruitment Ltd ('the Company') is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process personal data (including special categories of 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. We will always comply with current data protection laws.

## 1. Introduction

### a. Purpose of processing and legal basis

The Company will collect your personal data (which may include special categories of 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. You can opt-out from receiving this marketing material at any time by texting "stop" when you receive these communications from us.

On some occasions we may be required to use your data for the purpose of investigating, reporting, and detecting crime and 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.

### b. Legitimate interest

Article 6(1)(f) of the UK GDPR gives you a lawful basis for processing where:

"processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child".

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 regarding suitable live vacancies
- Contacting you to seek your consent where we need it;
- Giving you information about similar products or services to those that you will have used from us recently;

On some occasions we may be required to use your data for the purpose of investigating, reporting, and detecting crime and 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.

### 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 require this personal data, and we may need your data to enter into a contract with you. If you do not give us the personal data, we need to collect In order to comply with our statutory and legal requirements, 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:

- Clients (who we may introduce or supply you to)
- Your former employers who we may seek references from
- Payroll service providers who manage payroll on our behalf or other payment intermediaries who we may introduce you to
- Other recruitment agencies in the supply chain
- Auditors who are assessing the compliance and processes of the business to ensure its adherence to all relevant legislation and good practice guidance

## 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)

*Special categories of personal data:*

- Bank Details
- Criminal conviction(s)

**Source of the personal data:** The Company sourced your personal data/special categories of personal data:

- From Client Recommendations, jobs boards, LinkedIn
- A former employers
- A referee whose details you previously provided to us
- Cookies listed in section 7

## 3. Overseas Transfers

The Company may transfer the information you provide to us to countries outside the UK and/or the European Economic Area ('EEA') for the purposes of providing you with work-finding services and cloud-based storage / system providers. To ensure that your personal information receives an adequate level of protection, we have put in place appropriate procedures with the third parties we share your personal data with to ensure that your personal information is treated by those third parties in a way that is consistent with, and which respects the law on data protection. 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 are required to keep your records relating to the right to work in the UK 2 years after employment or the engagement has ended alterable and working time records including your 48 hour opt out notice annual leave/holiday records 2 years from the time they were created.

Additionally, 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, we will do so in line with our 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.

a) Where *personal data* has been collected **from an individual** a privacy notice will be issued at the point the data is collected. Where the Company intends to further process the personal data beyond what the individual was advised, the Company shall provide him or her, prior to that further processing, with information on that other purpose and with any relevant further information in a new updated privacy notice.

b) Where *personal data* has **not been obtained from the individual**, the Company shall provide a privacy notice within a reasonable period after obtaining the personal data, but at the latest within one month, having regard to the specific circumstances in which the personal data are processed. If the personal data are to be used to communicate with the individual, then the privacy notice will be issued at the latest at the time of the first communication with the individual. If a disclosure to another recipient is envisaged, then at the latest the privacy notice will be issued to the individual when the personal data are first disclosed.

Company staff will be responsible for issuing privacy notices to individuals whose personal data is processed by the Company in the timeframes and circumstances mentioned above.

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 [compliance@e3recruitment.com](mailto:compliance@e3recruitment.com). 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 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. Cookies can be cleared by clearing your browsing data on your laptop.

## 7. 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.

## 8. 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. Where the sale of the business results in the transfer of your details to a different data controller we will notify you of this.

## 9. Data Security

The Company takes every precaution to protect users' information using tools such as firewalls, browser certification technology, encryption, limited access, use of passwords etc.

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 [compliance@e3recruitment.com](mailto:compliance@e3recruitment.com)**

## 10. 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.

## 11. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it, please contact: Joe Brownbill: [compliance@e3recruitment.com](mailto:compliance@e3recruitment.com)

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