

CLASS 1

Personnel

Privacy Policy

Company Name:	Class 1 Personnel (Facilities Management) Ltd ('the Company')
Company Contact details:	Bernadette Collins: bernadette@class1personnel.com Elaine Hannon: elaine@class1personnel.com Class 1 Personnel (Facilities Management) Ltd, Ashley House, 86-94 High Street, Hounslow TW3 1NH
Document DP5	Privacy Notice
Topic:	Data protection
Date:	22/05/2018
Version:	1

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.

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.

CLASS 1

Personnel

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.

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:

- Clients (whom we may introduce or supply you to)
- Former employers whom we may seek references from
- Other recruitment agencies in the supply chain
- 3rd Party Clients where required by law for Auditing purposes
- Government bodies where required by law
- Trade Bodies that we are members of – REC, GLA, ISO, ALP.
- HR and Insurance companies – Intersure & Avensure
- IT and CRM providers – GW Networking, Oxford Software, Paloma
- Pass Track, ID Centre, UCheck, DVLA for verifying and processing documents
- 3rd Party Clients for processing your data for work finding services
- Government law enforcement agencies and other regulators

CLASS 1

Personnel

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 address
- National insurance no.
- Nationality (through right to work check)
- Next of Kin and emergency contact information
- Bank account details, payroll records and tax status information
- Salary, annual leave, pension and benefits information
- Copy of driving licence – if applicable
- Photographs – if applicable
- Employment Records

Sensitive personal data:

- Health information including whether you have a disability
- Criminal conviction

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

- Online registration
- Job boards – Indeed, Reed, Gumtree, Jobs Today, E4S, Student Jobs
- Recommendations
- Website responses
- Application Forms
- CVs

Some of this information may come from a publicly accessible source.

3. 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.

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 after the date on which we last

CLASS 1

Personnel

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 and sensitive personal data as per above, we will do so in line with our retention policy which is for 2 years from the date that you cease to work. 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 and sensitive 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 and sensitive personal data you have the right to withdraw that consent at any time by contacting Bernadette Collins bernadette@class1personnel.com or Elaine Hannon elaine@class1personnel.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

CLASS 1

Personnel

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
Session Cookie	PHPSESSID	This session cookie is essential for the identification of a user on this website. This cookie is deleted when you close your browser.
Hide reveal javascript cookie	Acgroupswithpersistacopendividslist-List	This cookie is set by our website to show and hide certain elements of the page when the user clicks on a link. This cookie is deleted when a user closes their browser.

7. Links to external websites

The Company's website may contains 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.

9. Data Security

The Company takes every precaution to protect our users' information. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, or other third parties who have a business need to know. They only process your personal information on our instructions and they are subject to a duty of confidentiality.

CLASS 1

Personnel

Only employees who need the information to perform a specific job (for example, consultants, administrators, HR, 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

info@class1personnel.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: Bernadette Collins: bernadette@class1personnel.com or Elaine Hannon: elaine@class1personnel.com.

CLASS 1

Personnel

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.